EPA Registration No. 85556-1 Vol. 1

Material Sent for Data Extraction

Reg # _ 83336-/
Description:
Material(s) Sent to Data Extraction Contractors:
New Stamped Label Dated
Notification Dated
New CSF(s) Dated
Other:
☐ Decision #: 46 6 355
☐ Other Action/Comments:
Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).
Reviewer: E. Oiguenbl. L. PM31.
Phone: 347-0199 Division: AB
Date: Created February 3, 2011

Thomas L. Higgins President AP Goldshield LLC 9570 Pan American Dr. El Paso, Texas 79927

JUN 26 2012

SUBJECT:

Goldshield 5

EPA Registration Number: 85556-1 Application Date: June 1, 2012 Receipt Date: June 5, 2012

Dear Mr. Higgins:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable.

To revise the STORAGE AND DISPOSAL language to be in agreement with PR Notice 2007-4 and Chp.13 of the Label Review Manual.

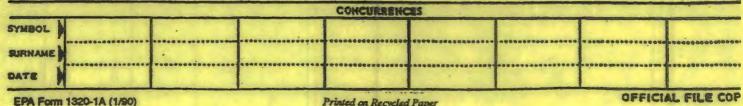
General Comments

A stamped copy of the accepted labeling is enclosed. Submit 1 copy of your final printed labelbefore distributing or selling the product bearing the revised labeling. Should you have any questions concerning this letter, please contact Emilia Oiguenblik at (703) 347 0199 or Velma Noble at (703) 308-6233.

Sincerely

Product Manager (31)

Regulatory Management Branch I Antimicrobials Division (7510P)



Printed on Recycled Paper



Goldshield®5 MICROBIOSTATIC AGENT A Silicone Quaternary Ammonium Salt

ACCEPTED	-
JUN 2 6 2012	-
Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. \$5556-1	

Active Ingredient:	3-(Trihydroxysilyl)propyldimethyloctadecyl ammonium chloride	5.0%
Other Ingredients:		95.0%
INGREDIENTS:	KEEP OUT OF REACH OF CHILDREN	100.0%

EPA Reg. No. 85556-1

WARNING

EPA EST, 82816-SC-001

NET CONTENTS: 2, 4, 8, 16, 20, 22, or 36 fluid oz.; 1, 5, 55, 150, or 275 gal.

Lot No.

FIRST AID

Have the product container or label with you when calling the poison control center or doctor, or going for treatment.

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
- Call poison control center or doctor for treatment advice.

IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.
- Call a poison control center or doctor for further treatment advice.

IF ON SKIN:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- · Call a poison control center or doctor for treatment advice.

IF SWALLOWED:

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- Call a poison control center or doctor immediately for treatment advice.
- · Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

A microbiostatic agent is an agent that inhibits the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae. This product does not protect users or others against food-borne or disease-causing bacteria.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING. Causes substantial but temporary eye injury. Harmful if absorbed through skin or inhaled. Do not get in eyes. Avoid contact with skin and avoid breathing vapor. Wear protective eyewear (goggles or face shield). Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

<u>Commercial and industrial uses:</u> This pesticide is toxic to fish when discharged in bulk. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

De-activation may be required during clean up if a spill occurs. De-activation of GOLDSHIELD ®5 can be achieved by the addition of anionic surfactant (such as soap, sulfonates, sulfates) in quantity equivalent to that of GOLDSHIELD® 5.

<u>Homeowner use:</u> This pesticide is toxic to fish. When discharged in bulk Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of pesticide.

DIRECTIONS FOR USE

Approved commercial and Industrial Applications
Approved commercial applications used in homes, offices, automobiles and institutions
e.g., schools, hospitals, daycare centers, churches, correctional facilities ACCEPTED

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Wear protective eyewear (goggles or face shield) and gloves when using this product. Dry treated areas and articles such as clothing before use. Remove children and pets from treated area until completely dry.

Prepare solutions by simply adding *GOLDSHIELD* **®5** to solvent and stirring. Dilute *GOLDSHIELD* **®5** by adding 0.2 to 2 fluid ounces of *GOLDSHIELD* **®5** per cup (3.2 to 32 fluid ounces of *GOLDSHIELD* **®5** per gallon) of water or other solvents (for example, alcohol and ketones) and then applied to organic or inorganic substrates by brushing, dipping, padding, soaking, spraying, fogging or by using foam finishing techniques to give a final treatment of 0.1 to 1.0 percent by weight active ingredient.

Dry substrates at temperatures from ambient to a maximum of 160° C (320° F) to effect complete condensation of silanol groups and to remove water, solvents and/or traces of methanol from hydrolysis. Optimum application and drying conditions, such as time and temperature, should be determined for each application before use. If necessary, reapply *GOLDSHIELD* ®5 every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.

GOLDSHIELD ®5 when used as a concrete additive is added directly during concrete preparation. Use 6 fluid ounces GOLDSHIELD ®5 per cubic feet of concrete. Add to water before addition of concrete. Addition of GOLDSHIELD ®5 reduces deterioration of sewer pipes and manholes by inhibiting microbiologically induced corrosion.

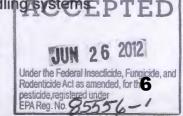
GOLDSHIELD ®5 when used as an additive for paints and coatings is added directly during preparation of the paint or coating. Use 5 pounds of GOLDSHIELD ®5 per 100 pounds of paint or coating (or 1 pound GOLDSHIELD ®5 per 20 pounds paint/coating). The addition of the antimicrobial agent GOLDSHIELD ®5) to paints at the point of manufacture preserves the paint in the can as well as the dried paint film. GOLDSHIELD ®5 inhabits the growth of odor causing bacteria, bacteria which causes staining and discoloration, fungi (mold and mildew), and algae on the surface of dried films and coatings.

Approved commercial and industrial applications

The active ingredient in *GOLDSHIELD* ®5 is effective against bacteria, fungi, odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae as a static agent. *GOLDSHIELD* ®5 can be used as a final bacteriostatic finish on the following items to impart bacteriostatic/fungistatic (mold and mildew) activity.

• Air filters for furnaces, air-conditioners, air purification devices, automobiles, recirculating air handling systems

Air filters/materials



PAGE 4 - MASTER LABEL FOR GOLDSHIEL 55

- · Aquarium filter material
- · Bed sheets, blankets, and bedspreads
- · Buffer pads (abrasive and polishing)
- · Carpets and draperies
- Cellulose sponges
- Concrete additive for sewer pipes, manholes and concrete sewer structures; not to be used in treatment of storm drains
- Concrete additive for repair and renewal of sewer pipes and manholes and concrete sewer structures; not to be used in treatment of storm drains
- Exterior walls (such as stone, concrete, brick)
- Fiberfill for upholstery, sleeping bags, apparel, where the fiber is cotton, natural down, nylon, polyester, rayon, or wool
- Fiberglass ductboard
- Fire hose fabric
- Humidifier belts
- · Mattress pads and ticking
- · Mens underwear and outerwear
- · Non-woven disposable diapers
- Non-woven polyester
- Outerwear apparel (jackets, sweaters, sweatshirts, coats, raincoats, overcoats, jerseys, ponchos)
- GOLDSHIELD ®5 can be used in paints and coatings as an in can preservative for protection of paint film and
 coating film. Types of paints and coatings include: latex indoor/outdoor paints and stains, wood-stains, architectural
 paints, lacquer and maintenance coatings, films, laminates and finishes including alkyd, urethane, enamel, epoxy,
 siloxaline, amino resins, textile coatings, extrusion coatings, architectural coatings and overlays, anti-corrosion
 coatings, fire-resistant coatings, aliphatic coatings, vinyl-ester and polyester coatings, gel coatings, amino resins,
 resins used as additive mixes for cement, epoxy laminating resins, and blends and copolymers thereof;
- Polyurethane and cellulose foam for household, industrial, and institutional sponges and mops
- · Polyurethane and polyethylene foam, when covered
- Polyurethane foam for packaging and cushioning in non-food contact applications
- Polyurethane foam used as a growth medium for non-food crops and plants
- Pre-moistened towelettes and tissue wipes (these do not impart pesticidal properties)
- · Roofing materials defined as shingles, roofing granules, wood shakes, felt, stone and synthetic overcoats
- Sand bags, tents, tarpaulins, sails, and ropes
- · Athletic and casual shoes
- Shoe insoles
- Shower curtains

JUN 26 2012

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No 95556-4

PAGE 5 - MASTER LABEL FOR GOLDSHIEL

 Socks comprised of nylon, nylon/orlon, cotton/nylon, linen/Lycra, acrylic/polypropylene/nylon/Lycra wool/silk/nylon/Lycra and wool/acrylic/nylon/Lycra

Throw rugs

Toweling made of 100 percent cotton, 100 percent polyester, and blends of the two fibers

· Toilet tank and seat covers

Umbrellas

Upholstery made of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefins, polypropylene, rayon, spandex, vinyl, wool

Vacuum cleaner bags and filters

Vinyl paper-wallpaper for non-food contact surfaces

 Disposable wiping cloths that can be used for multiple purposes such as dusting or washing furniture, cars, walls, windows, floors, appliances, dishes, counter tops; the wiping cloths do not impart pesticide properties

Women's hosiery

Women's intimate apparel

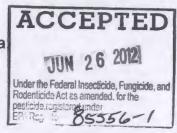
DIRECTIONS FOR USE

Approved commercial applications used in homes, offices, automobiles and institutions e.g., schools, hospitals, daycare centers, churches, correctional facilities

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Wear protective eyewear (goggles or face shield) and gloves when using this product. Dry treated areas and articles such as clothing before use. Remove children and pets from treated area until completely dry. Clean surfaces prior to application.

For Pump Spray Application: Dilute 8 ounces of GOLDSHIELD ®5 per gallon of water (2 oz. per quart; 1oz. per pint). Using pump sprayer, spray entire area 4"- 6"s from the surface making sure the surface is completely covered. Apply and then let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test for staining and color-fastness of fabrics and carpets by treating and drying a small, concealed area prior to application. GOLDSHIELD ®5 treats approximately 200 square feet per diluted gallon of water. When treating coarser substrates, more GOLDSHIELD ®5 T may be required due to absorption. A fan may be used to assist in drying carpeting.

For Commercial Spray Application: For commercial application equipment (i.e. carpet/upholstery steamers, rotary jet extraction cleaners, pressure sprayers) dilute 8 ounces of GOLDSHIELD ®5 per gallon of water (2 oz. per quart; 1oz. per pint); mix well. Apply and then let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test for staining and color-fastness of fabrics and carpets by treating and drying a small, concealed area prior to application. GOLDSHIELD ®5 treats approximately 200 square feet per diluted gallon



of water. When treating coarser substrates, more *GOLDSHIELD* ®5 may be required due to absorption. Dry carpet areas and surfaces before re-entry and dry articles before use. A fan may be used to assist in drying carpeting. *For Dipping/Soaking Application:* Use appropriate sized wash basin or tub for dipping/soaking the item you are treating. Use enough *GOLDSHIELD* ®5 solution to completely submerge item. Dilute 8 ounces of *GOLDSHIELD* ®5 per gallon of water (2 oz. per quart; 1oz. per pint); mix well. Completely submerge item in solution for 3 minutes. Remove item and dry. Test for staining and color-fastness of fabrics by treating and drying a small, concealed area prior to application. Do not reuse solution after dipping/soaking.

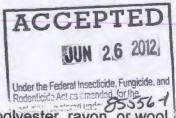
The substrate can be dried at room temperatures or at temperatures to a maximum of 160° C (320° F), for example in a clothes dryer. Remove excess liquid before attempting to dry in a clothes dryer. If necessary, reapply *GOLDSHIELD* ®5 every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.

Approved commercial applications in homes, offices, automobiles and institutions e.g., schools, hospitals, day care centers, banks, churches, correctional facilities

The active ingredient in *GOLDSHIELD* **®5** is effective against odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae as a static agent.

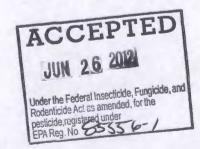
GOLDSHIELD ®5 can be used as a final bacteriostatic finish on the following items to impart bacteriostatic/fungistatic (mold and mildew) activity.

- Air filters for furnaces, air-conditioners, air purification devices, automobiles, recirculating air handling systems
- · Air filters/materials
- Aguarium filter material
- · Bed sheets, blankets, and bedspreads
- Buffer pads (abrasive and polishing)
- · Carpets and draperies
- · Cellulose sponges
- Exterior walls(such as stone, concrete, brick)
- Fiberfill for upholstery, sleeping bags, apparel, where the fiber is cotton, natural down, nylon, polyester, rayon, or wool.
- Fiberglass ductboard
- · Fire hose fabric
- Humidifier belts
- · Mattress pads and ticking
- · Mens underwear and outerwear
- Non-woven polyester
- Outerwear apparel (jackets, sweaters, sweatshirts, coats, raincoats, overcoats, jerseys, ponchos)



PAGE 7 - MASTER LABEL FOR GOLDSHIEL

- · Polyurethane and cellulose foam for household, industrial, and institutional sponges and mops
- · Polyurethane and polyethylene foam, when covered
- · Polyurethane foam for packaging and cushioning in non-food contact applications
- · Polyurethane foam used as a growth medium for non-food crops and plants
- · Roofing materials defined as shingles, roofing granules, wood shakes, felt, stone and synthetic overcoats
- · Sand bags, tents, tarpaulins, sails, and ropes
- · Athletic and casual shoes
- Shoe insoles
- Shower curtains
- Socks comprised of nylon, nylon/orlon, cotton/nylon, linen/Lycra, acrylic/polypropylene/nylon/Lycra, wool/silk/nylon/Lycra and wool/acrylic/nylon/Lycra
- Throw rugs
- Toweling made of 100 percent cotton, 100 percent polyester, and blends of the two fibers
- · Toilet tank and seat covers
- Umbrellas
- Upholstery made of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefins, polypropylene, rayon, spandex, vinyl, wool
- · Vacuum cleaner bags and filters
- Vinyl paper-wallpaper for non-food contact surfaces
- Disposable wiping cloths that can be used for multiple purposes such as dusting or washing furniture, cars, walls, windows, floors, appliances, dishes, counter tops; the wiping cloths do not impart pesticide properties
- Women's hosiery
- · Women's intimate apparel



DIRECTIONS FOR USE For homeowner applications

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Wear protective eyewear (goggles or face shield) and gloves when using this product. Dry treated areas and articles such as clothing before use. Remove children and pets from treated area until completely dry. Clean surfaces prior to application.

Approved homeowner uses

The active ingredient in *GOLDSHIELD* **®5** is effective against odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae as a static agent. *GOLDSHIELD* **®5** can be used as a final bacteria to finish on the following items to impact be to imp

bacteriostatic finish on the following items to impart bacteriostatic/fungistatic (mold and mildew) activity.

	Pest controlled	Dilution Rate	Method of Application
Bed-sheets, blankets, bedspreads, curtains, draperies (washable only), underwear, socks, intimate apparel, hosiery, throw rugs, toweling, toilet tank covers, shower curtains, shoe insoles, outerwear apparel (jackets, sweaters, sweatshirts, coats, raincoats, overcoats, jerseys, ponchos). GOLDSHIELD ®5 can be applied to fabrics made of acetates, acrylics, cotton, fiberglass, linen, Lycra, nylon, orlon, polyester, polyethylene, polyolefins, polypropylene, rayon, silk, spander, whyl, and wool	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	8 oz./ gallon 2 oz./ quart 1 oz./pint	DIP/SOAK: Dilute GOLDSHIELD ®5 in water; mix well. Use appropriate sized wash basin or tub for dipping/soaking the item you are treating. Use enough GOLDSHIELD ®5 solution to completely submerge item. Keep item in solution for 3 minutes. Remove item and wring excess liquid. Drying may be attained by dripping dry or wringing excess liquid from treated item. For larger items (e.g., bedspreads, curtains, draperies), place in washing machine on spin cycle to aid in the removal of excess liquid. Test staining and color-fastness of fabric and carpets by treating and drying a small concealed area prior to application. Do not reuse solution after dipping/soaking. Dry treated articles before use. Substrates can be hang-dried at room temperature or at temperatures to a maximum of 160 °C (320 °F); (for example in a clothes dryer). If necessary, reapply GOLDSHIELD ®5 every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return. SPRAY: Dilute GOLDSHIELD ®5 in water; mix well. Clean surface prior to application. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4"-6" from the surface making sure the surface is completely covered.

			Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test staining and color-fastness of fabric by treating and drying a small concealed area prior to application. If necessary, reapply <i>GOLDSHIELD</i> ®5 every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.
	Pest controlled	Dilution Rate	Method of Application
 Air filters and air filter material for Furnaces, air conditioners Air purification systems Automobiles Recirculating air handling systems Vacuum cleaner filters Aquariums 	Odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae	8 oz./ gallon 2 oz./ quart 1 oz./pint	SPRAY: Dilute GOLDSHIELD ®5 in water; mix well. When treating filters, remove filter from the unit. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4"- 6" from the surface making sure the surface is completely covered. Apply and then let stand until dry. If necessary, reapply GOLDSHIELD ®5 every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.
	Pest controlled	Dilution Rate	Method of Application
ACCEPTED JUN 26 2012 Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered larger EPA Reag. No. Sp. 536—I	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	8 oz./ gallon 2 oz./ quart 1 oz./pint	SPRAY: Dilute GOLDSHIELD ®5 in water; mix well. Apply to clean carpet surface. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4"- 6" from the surface making sure the surface is completely covered. For rotary jet extraction cleaners and carpet steamers, add the diluted GOLDSHIELD ®5 solution directly to the cleaning tank, then operate the equipment in accordance with manufacturer's instructions. Apply and then let stand until dry. Test staining and color-fastness of carpets by treating and drying a small concealed area prior to application. GOLDSHIELD ®5 treats approximately 200 square feet per diluted gallon of water. When treating coarser substrates (e.g., wool carpeting), more GOLDSHIELD ®5 may be required due to absorption. Dry carpet areas and surfaces before re-entry. A fan may be used to assist in drying carpeting. Remove children and pets from treated area until completely dried. If necessary, reapply GOLDSHIELD ®5 every three months or when

			odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.
	Pest controlled	Dilution Rate	Method of Application
Mattress pad and mattress ticking and upholstery composed of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefins, polypropylene, rayon, spandex, vinyl, wool; fiberfill to be used in upholstery, sleeping bags, apparel, where the fiber is cotton, natural down, nylon, rayon or wool	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	8 oz./ gallon 2 oz./ quart 1 oz./pint	SPRAY: Dilute GOLDSHIELD ®5 in water; mix well. Clean surfaces prior to application. Using a trigger pump sprayer spray the entire surface area 4"- 6" from the surface making sure the surface is completely covered. Apply and then let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test staining and color-fastness of fabric by treating and drying a small concealed area prior to application. When applying to mattress pads and ticking do not soak. Remove children and pets from treated area until completely dried. If necessary, reapply GOLDSHIELD ®5 every three months or when odor, staining and discoloration due to bacteria, mold stains and mildew stains return.
	Pest controlled	Dilution Rate	Method of Application
ACCEPTED JUN 26 2012 Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registrated under EPA Reg. No 25336—1	Odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae	8 oz./ gallon 2 oz./ quart 1 oz./pint	SPRAY: Dilute GOLDSHIELD ®5 in water; mix well. Clean surface prior to application. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4"-6" from the surface making sure the surface is completely covered. Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test staining and color-fastness of fabric by treating and drying a small concealed area prior to application. If necessary, reapply GOLDSHIELD ®5 every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return. DIP/SOAK: Dilute GOLDSHIELD ®5 in water and mix well. Use appropriate sized wash basin or tub for dipping/soaking the item you are treating. Use enough

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under

			GOLDSHIELD ®5 solution to completely submerge item. Keep item in solution for three minutes. Remove item and wring excess liquid. Test staining and color-fastness of fabric by treating and drying a small concealed area prior to application. Do not reuse solution after dipping/soaking. Dry treated articles before use. Substrates can be hang-dried at room temperature or at temperatures to a maximum of 160 °C (320 °F); (for example in a clothes dryer). Remove excess liquid before attempting to dry in a clothes dryer. If necessary, reapply GOLDSHIELD ®5 every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.
	Pest controlled	Dilution Rate	Method of Application
Roofing materials (such as shingles, roofing granules, wood shakes, felt, stone, synthetic overcoats) Exterior walls (such as stone, concrete, brick)	Odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae	8 oz./ gallon 2 oz./ quart 1 oz./pint	SPRAY: Dilute GOLDSHIELD ®5 in water; mix well. Make sure the roof or wall is clean prior to application. Using a pressure sprayer, spray the entire surface area 6"-12" from the surface making sure the surface is completely covered. After applying the dilute solution of GOLDSHIELD ®5 let stand until dry. GOLDSHIELD ®5 treats approximately 200 square feet of roofing or wall per diluted gallon of water. If necessary, reapply GOLDSHIELD ®5 every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.
	Pest controlled	Dilution Rate	Method of Application
Buffer pads (polishing and abrasive), Polyurethane and cellulose foam for household sponges and mops, vacuum cleaner bags, umbrellas, casual shoes, athletic shoes	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	8 oz./ gallon 2 oz./ quart 1 oz./pint	SPRAY: Dilute GOLDSHIELD ®5 in water; mix well. Clean surface prior to application. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4"-6" from the surface making sure the surface is completely covered. Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. If necessary, reapply GOLDSHIELD ®5 every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.

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	Pest controlled	Dilution Rate	Method of Application
Tubs, glazed tiles, vanity tops, shower curtains, shower stalls (areas), sinks, washable walls, wall paper for non-food contact, floors, window sills, cabinets, garbage cans, appliances, refrigerators (exterior), fiberglass, formica, glazed tiles, glazed porcelain, synthetic marble, plastic, vinyl	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	8 oz./ gallon 2 oz./ quart 1 oz./pint	SPRAY: Dilute GOLDSHIELD ®5 in water; mix well. Using a trigger pump sprayer, spray the entire surface area 4"-6" from the surface making sure the surface is completely covered. Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. If necessary, reapply GOLDSHIELD ®5 every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.

MOLD, MILDEW, ODOR PROTECTOR AND INHIBITOR *GOLDSHIELD* ®5 is an antimicrobial agent effective against odor causing bacteria.

GOLDSHIELD ®5 is an antimicrobial agent effective against bacteria which cause staining and discoloration.

GOLDSHIELD ®5 is an antimicrobial agent effective against fungi (mold and mildew).

GOLDSHIELD ®5 is an antimicrobial agent effective against algae.

GOLDSHIELD ®5 an antimicrobial agent, controls the source of odors on surfaces in the home, in the bathroom, in the kitchen. Bacteriostatic, fungistatic (mold and mildew), algaestatic.

GOLDSHIELD ®5 an antimicrobial agent, inhibits smelly odors caused by mold and mildew that can grow even in the cleanest of homes.

GOLDSHIELD ®5, an antimicrobial agent, inhibits the growth of odor causing bacteria.

Effective on hard non-porous washable bathroom and kitchen surfaces and fixtures around the home.

Effective on modern hard non-porous washable surfaces made of fiberglass, glazed porcelain, Formica[®], stainless steel, synthetic marble.

Imparts microbiostatic properties.

Use on carpet and upholstery to inhibit odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew).

Unscented.

Use on carpet and upholstery to inhibit the growth of odor causing bacteria.

Use on carpet and upholstery to inhibit the growth of bacteria which cause staining and discoloration.

Use on carpet and upholstery to inhibit the growth of fungi (mold and mildew).

Use on carpet and upholstery to inhibit the growth of odor causing bacteria, bacteria which cause staining discoloration, fungi (mold and mildew), and algae.

Provides an invisible microbiostatic coating to inhibit the growth of odor causing bacteria.

Provides an invisible microbiostatic coating to inhibit the growth of bacteria which cause staining and discoloration.

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Provides an invisible microbiostatic coating to inhibit the growth of fungi (mold and mildew).

Provides an invisible microbiostatic coating to inhibit the growth of algae.

Provides an invisible microbiostatic coating to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae.

Prevents deterioration caused by bacteria and fungi (mold and mildew).

Inhibits deterioration caused by bacteria.

Resists development of microbial odors.

Resists development of stains and discoloration due to bacteria.

Resists development of stains due to fungi (mold and mildew).

Resists stains due to algae.

Resists development of microbial odors, stains and discoloration due to bacteria, fungi (mold and mildew), and algae.

Provides/creates an invisible barrier to inhibit the growth of odor causing bacteria.

Provides/creates an invisible barrier to inhibit the growth of bacteria which cause staining and discoloration.

Provides/creates an invisible barrier to inhibit the growth of fungi (mold and mildew).

Provides/creates an invisible barrier to inhibit the growth of algae.

Provides/creates an invisible barrier to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae.

Provides/creates an invisible barrier to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae.

STORAGE AND DISPOSAL

Up to 5 gallons

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

Pesticide Storage: Store in original, tightly closed containers below 30°C (86°F) and above 0°C (32°F) in a secure area inaccessible to children and away from food, pet food, feed, seed, fertilizers, and veterinary supplies

Pesticide Disposal: Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility. [For

Home owners use the statement will read: Pesticide disposal: Wastes resulting from the use of this product may be disposed of on site]

Container Disposal: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after flow begins to drip. Repeat this procedure two more times. Offer for recycling if available or dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke. [For homeowners use statement will read:

Container Disposal: Securely wrap original container in several layers of newspaper and discard in trash.]

5 gallon containers and larger (not for homeowner)

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

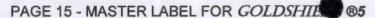
<u>Pesticide Storage</u>: Store in original, tightly closed containers below 30°C (86°F) and above 0°C (32°F) in a secure area inaccessible to children and away from food ,pet food, feed, seed, fertilizers, and veterinary supplies

<u>Pesticide Disposal</u>: Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

Container Disposal: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Offer for recycling if available or dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Note: Any claims for paint use must be for the preservative of the paint in the can. GOLDSHIELD ®5 is to be used as an in can preservative for paints to control the growth of odor causing bacteria, bacteria which can be used as discoloration, fungi (mold and mildew) and algae.

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the



FOR MORE INFORMATION CONCERNING THIS PRODUCT, PLEASE CONSULT THE MATERIAL SAFETY DATA SHEET (MSDS). THE MSDS CAN BE OBTAINED BY WRITING: AP Goldshield LLC, 9570 Pan American Dr., El Paso Texas, 79927 or emailing: customerservice@goldshieldtech.com

IMPORTANT: WARRANTY AND DISCLAIMER INFORMATION

AP GOLDSHIELD, LLC warrants that the product conforms to its chemical description and is reasonably fit for the purposes stated in this bulletin when used in accordance with directions under normal conditions of use; but this warranty of fitness for a particular purpose does not extend to the use of this product contrary to bulletin instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to the seller, and buyer assumes the risk of any such use.

AP GOLDSHIELD LLC SPECIFICALLY DISCLAIMS ANY OTHER EXPRESS OR IMPLIED WARRANTY, INCLUDING THE WARRANTY OF MERCHANTABILITY



\$50.00 off Residential Plumbing Call

Print Coupon and Give to Technician

\$50.00 off any residential plumbing call.

*Expires 06.30.2012. Residential use only. Can not be used towards any dispatch fee's.

RISK ASSIGNMENT FORM Antimicrobial Division/Regulatory Management Branch I

A		С	ompleted by	Product Mana	ger		
PRODUCT	REVIEWER:	2 m	ilin		RMBI	TEAM 3	1
Type of Ac	tion:	Zapel	Amedon	et	EPA FIL	e Symbol/Reg	No.
Decision	No. 466313				for Service A	ction Code:	
FQPA Action	on Code: 302	Non-FQPA	Action Code	e: F	PRIA FEE AMO	UNT:	
		MONTH		DAY		YEAR	
APPLICAT	ION DATE	6	1			2012	
EPA PIN D	ATE	6	65	-		2012	
FRONT END	ECEIVED FROM					2012	
DATE SEN	T TO SCIENCE				31145		
DATE REC	EIVED FROM				11-11-11		
DATE DUE	TO PM						
Type of Data:	PSB Product Chemistry	PSB Acute Toxicology	PSB Efficacy	RASSB Environmental Fate	RASSB Ecological Effects	RASSB Chronic Toxicology	RASSB Exposure Residue
	Inhel A	Insilnot	- 6	ine to	Enila		
ATTACHM	ENTS: -LABEL	ING €-	CSF(S)	€-DATA	€-OTH	IERS	
В			For Arctic SI	ope Contract O	nly		
Conti	ract No.: 0052	ARCTI	C SLOPEIM	ANAGER			
Final	Task: Signature				(Total hrs	3)	
C Revie	wer Comments:						44
DATE FEE	DAID:		DESPON	SE CODE:	DESD	ONSE DATE:	



GS LABELS Tom Higgins

Emilia Oiguenblik 06/21/2012 02:15 PM

Hide Details

From: Tom Higgins <thgoldshield@optonline.net>

To: Emilia Oiguenblik/DC/USEPA/US@EPA

5 Attachments







image001.png Master Label 05 final 6.21.2012.doc Master Label 05 final 6.21.2012.pdf





MAsterlabel 75 Final AP 6 21 122.doc MAsterlabel 75 Final AP 6 21 122.pdf

Thomas L Higgins (Tom) President/CEO AP Goldshield LLC 516.674.4085 P 516.759.5309 C 516.759.5309 F

www.goldshieldtech.com www.goldshieldindustries.com (new)





AP Goldshield LLC

9570 Pan American Dr. El Paso, Texas, 79927

516.674.4085 P

www.goldshieldtech.com thgoldshield@optonline.net

516.759.5309 F

To: Ms. Velma Noble From Tom Higgins Date: June 1, 2012

RE: Labels for 85556-1 and 85556-2

Dear Ms. Noble,

Thank you for returning my call today, here are the issues I need addressed:

- a) We needed to get our existing labels in compliance on both products, and we have therefore enclosed the two proforms container labels derived from our Master labels, which we need to be reviewed and approved. This is most urgent as region 5 needs notification that they have been approved to remove a stop sale order. Since we're a small company the stop sale action is really hurting our business, so we're asking if you could fast track a review of the enclosed labels, I would sincerely appreciate it.
- b) The second issue is that region 5 suggested that we submit either a "notification," or "amendment" on the new language for container disposal. Therefore, I have attached in APPENDIX "A" what we interpret as being in compliance with the new required specification for container disposal and would like some guidance as to how we should proceed to convert to the new language.
- c) Lastly on Jan 12, 2012our consultant, A. Lowell Snow, submitted in our behalf an amendment to our existing labels, which we would like to know the status of, so that we can incorporate the amended language into the attached labels.

I thank you in advance and if there are any questions please feel free to call or email.

Sincerely,

Tom Higgins President

......



AP Goldshield LLC

9570 Pan American Dr. El Paso, Texas, 79927

516.674.4085 P

www.goldshieldtech.com

516.759.5309 F

To: Velma Noble From: Tom Higgins Date: June 8, 2012

Subjects:

Goldshield 5 & 75 EPA Reg. # 85556-1 and 85556-2 Amendment Submitted Jan.12, 2012

Dear Ms. Noble.

I am responding to the letters you sent to our consultant A. Lowell Snow, Date 5, 30, 2012. I would like to address each letter separately, fist to the letter regarding Goldshield 5 (85556-1) your items #1 and #4.

We have enclosed the full labels the with all sections and language including with the new Storage and Disposal language in accord with PR notice 2007-4 and Chp. 13 of the Label Review Manual. This should cure the deficiencies you pointed out in items # 1 and #4,

Regarding Item #3, your response is confusing, so hopefully this will cure that deficiency. We submitted an amendment to add these textile materials to our existing label, because the industry has moved beyond, "non-woven polyester" (an approved claim) to more inert materials such as polypropylene and relatively new fibers such as Kevlar. Our intent was not to do a "me-too" but simply add these textile fiber applications, as they are more readily available in the markets we service. To emphasize this point many non-woven materials previously made out of polyester for the correctional institution industry are now using non-woven polypropylene. So our objective was to amend our label to include the these other textile fibers.

Regarding item #2 concerning the application to non-food contact equipment, I would like to visit with you to show you how, where and why it should be applied, and how this equipment

does NOT come in contact with food. Please provide and date and time you are available.

Regarding your letter on Goldshield 75 (85556-2) specifically your items #1, #2, and #5, should be cured by the enclosed labels that reflect all the deficiency points you raised in your letter.

Regarding item #4. Concerning the amendment to add the application to new textile materials, we submitted an amendment to add these textile materials to our existing label, because the Industry has moved beyond, "non-woven polyester" (an approved claim) to more inert materials such as polypropylene and relatively new fibers such as Kevlar. Our intent was not to do a "metoo" but simply add these textile fiber applications, as they are more readily available in the markets we service. To emphasize this point many non-woven materials previously made out of polyester for the correctional institution industry are now using non-woven polypropylene. So our objective was to amend our label to include the these other textile fibers.

Regarding item #3 concerning the application to non-food contact equipment, I would like to visit with you to show you how, where and why it should be applied, and how this equipment does NOT gome in contact with food. Please provide and date and time you are available.

Thomas L Higgins

CEO AP Goldshield LI

cc: A. Lowell Snow

A. Lowell Snow Consultant for AP Goldshield LLC 6981 Scenic Pointe Place Manassas, VA 20112



SUBJECT:

Goldshield 5

EPA Registration Number: 85556-1 Application Date: January 12, 2012 Receipt Date: March 5, 2012

Dear Mr. Snow:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is unacceptable due to the concerns listed below:

Additional use sites

Deficiencies

- 1) There are several instances in which text is missing from your label. For example, the Ingredients Statement is incomplete and the chart on pages 6 through 8 is incomplete. In both instances text is missing from the far right side of the page.
- 2) You have proposed adding the use: "Equipment parts, machines and surfaces (non food contact)". Based on our correspondence it appears that you desire to use this product on non food contact surfaces of **food processing equipment**. Such a use is not acceptable. Additional details of the proposed use including detailed directions for use are necessary (how is the product applied, to what surfaces, at what rate, by whom and how often.) The Agency does not agree that there are any surfaces of food processing equipment that are "non food contact". Thus the addition of such a use requires a petition for a tolerance or exemption from the requirement of a tolerance.



EPA Form 1320-1A (1/90)

Printed on Recycled Paper

TATES ENVIRONMENTAL PROTECTIO

Additionally, since this product is not effective against the target pests in the food processing industry (public health related antimicrobial pests) you would need support the reasons why this product should be used on this equipment. If it is not your intention for this product to be applied to food processing equipment, include such a restriction on your label. You would still be required to provide specific directions for use and clearly indicate the types of equipment to which this product is applied.

- 3) You have also added: "Textiles, woven and non woven made from the inert materials such as....nylon/spandex." Provide the Reg. No. of a product for which this use has previously been approved.
- 4) Revise your Storage & Disposal language to be in agreement with PR Notice 2007-4 and Chp. 13 of the Label Review Manual: http://www.epa.gov/oppfead1/labeling/lrm/

Submit revised labeling and detailed explanations addressing all of the concerns identified above. Should you have any questions concerning this letter, please contact Tracy Lantz at (703) 308-6415.

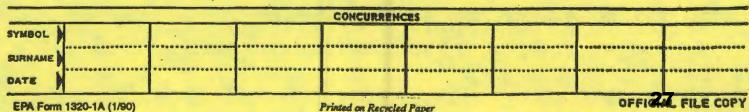
Sincerely,

Velma Noble

Product Manager (31)

Regulatory Management Branch I Antimicrobials Division (7510P)

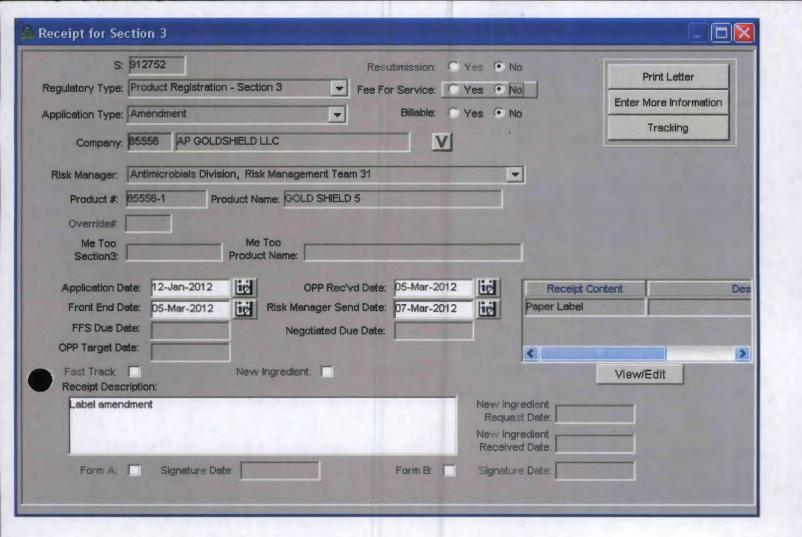
7510P:T.Lantz:5/30/12:85556-1 unacceptable label amend



Printed on Recycled Paper

RISK ASSIGNMENT FORM Antimicrobial Division/Regulatory Management Branch I

A	Completed by Product Manager							
PR	ODUCT F	REVIEWER:	TI	aly		RMBI	TEAM 3	1
Тур	e of Acti	ion:	Lake	(Amer	lmat		le Symbol/Reg	y No.
De	cision N	0.462242				e for Service A	ction Code:	//
		n Code: 302		Action Cod	le:	PRIA FEE AMO	UNT:	
			MONTH		DAY		YEAR	
API	PLICATION	ON DATE	1	1	2	2012	2011	
EP/	A PIN DA	TE	3	3		2012	2011	
	TE PM RE	CEIVED FROM		••			2011	
DA	TE SENT	TO SCIENCE						
	TE RECE	EIVED FROM						
DA	TE DUE	то РМ	6	6 3		2012		
Typ	oe of	PSB Product Chemistry	PSB Acute Toxicology	PSB Efficacy	RASSB Environmental Fate	RASSB Ecological Effects	RASSB Chronic Toxicology	RASSB Exposure/ Residue
	2	spel A	med m	of-	6 ne	A Trac	3	
ATI	TACHME	NTS: -LABEL	ING -	-DATA	-ОТН	IERS		
В				For Arctic S	lope Contract C	Only		
	Contra	ct No.: 0052	ARCTI	C SLOPEIN	IANAGER			
	Final Task: Signature (Total hrs)							
С	Reviev	ver Comments:						
DA.	TE FEE F	PAID:		RESPON	ISE CODE:	RESP	ONSE DATE:	





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

March 7, 2012

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

A. LOWELL SNOW
A. LOWELL SNOW CONSULTING
AP GOLDSHIELD LLC
6981 SCENIC POINTE PLACE
MANASSAS, VA 20112-

PRODUCT NAME: GOLD SHIELD 5

COMPANY NAME: AP GOLDSHIELD LLC

OPP IDENTIFICATION NUMBER: EPA FILE SYMBOL: 85556-1 EPA RECEIPT DATE: 03/05/12

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Antimicrobials Division, Risk Management Team 31, at (703) 308-6233.

Sincerely,

Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

Fee for Service

{912752&~

This package includes the following	for Division O AD O BPPD O RD Risk Mgr. 31		
 New Registration ● Amendment □ Studies? □ Fee Waiver? □ volpay % Reduction: 			
Receipt No. S- EPA File Symbol/Reg. No. Pin-Punch Date:	85556-1 3/5/2012		
This item is NOT subject to Action Code: Requested: Granted: Amount Due: \$	Parent/Child Decisions:		
Inert Cleared for Intended Use Reviewer: Team 1 Volume Remarks:	Uncleared Inert in Product Date: 3-6-12		



Active Ingredient:	3-(Trihydroxysilyl)propyldimethyloctadecyl ammonium chloride
Other Ingredients:	,
TOTAL	
INGREDIENTS:	

KEEP OUT OF REACH OF CHILDREN

EPA Reg. No. 85556-1 WARNING

EPA EST.

NET CONTENTS: 2, 4, 8, 16, 20, 22, or 32 fluid oz.; 1, 5, 55, 150, or 275 gal.

Lot No.

FIRST AID

Have the product container or label with you when calling the poison control center or doctor, or going for treatment. IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
- Call poison control center or doctor for treatment advice.

IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.
- Call a poison control center or doctor for further treatment advice.

IF ON SKIN:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

A microbiostatic agent is an agent that inhibits the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae. This product does not protect users or others against food-borne or disease-causing bacteria.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING. Causes substantial but temporary eye injury. Harmful if absorbed through skin or inhaled. Do not get in eyes. Avoid contact with skin and avoid breathing vapor. Wear protective eyewear (goggles or face shield). Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

Commercial and industrial uses: This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Philitani

PAGE 2 - MASTER LABEL FOR GOLDSHIELD ®5

Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

De-activation may be required during clean up if a spill occurs. De-activation of GOLDSHIELD ®5 can be achieved by the addition of anionic surfactant (such as soap, sulfonates, sulfates) in quantity equivalent to that of GOLDSHIELD® 5.

<u>Homeowner use:</u> This pesticide is toxic to fish. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of pesticide.

DIRECTIONS FOR USE Approved commercial and Industrial Applications

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Wear protective eyewear (goggles or face shield) and gloves when using this product. Dry treated areas and articles such as clothing before use. Remove children and pets from treated area until completely dry.

Prepare solutions by simply adding GOLDSHIELD ®5 to solvent and stirring. Dilute GOLDSHIELD ®5 by adding 0.2 to 2 fluid ounces of GOLDSHIELD ®5 per cup (3.2 to 32 fluid ounces of GOLDSHIELD ®5 per gallon) of water or other solvents (for example, alcohol and ketones) and then applied to organic or inorganic substrates by brushing, dipping, padding, soaking, spraying, fogging or by using foam finishing techniques to give a final treatment of 0.1 to 1.0 percent by weight active ingredient.

Dry substrates at temperatures from ambient to a maximum of 160° C (320° F) to effect complete condensation of silanol groups and to remove water, solvents and/or traces of methanol from hydrolysis. Optimum application and drying conditions, such as time and temperature, should be determined for each application before use. If necessary, reapply *GOLDSHIELD* ®5 every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.

GOLDSHIELD ®5 when used as a concrete additive is added directly during concrete preparation. Use 6 fluid ounces GOLDSHIELD ®5 per cubic feet of concrete. Add to water before addition of concrete. Addition of GOLDSHIELD ®5 reduces deterioration of sewer pipes and manholes by inhibiting microbiologically induced corrosion.

GOLDSHIELD @5 when used as an additive for paints and coatings is added directly during preparation of the paint or coating. Use 5 pounds of GOLDSHIELD @5 per 100 pounds of paint or coating (or 1 pound GOLDSHIELD @5 per 20 pounds paint/coating). The addition of the antimicrobial agent GOLDSHIELD @5) to paints at the point of manufacture preserves the paint in the can as well as the dried paint film. GOLDSHIELD @5 inhabits the growth of odor causing bacteria, bacteria which causes staining and discoloration, fungi (mold and mildew), and algae on the surface of dried films and coatings.

Approved commercial and industrial applications

The active ingredient in *GOLDSHIELD* ®5 is effective against odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae as a static agent. *GOLDSHIELD* ®5 can be used as a final bacteriostatic finish on the following items to impart bacteriostatic/fungistatic (mold and mildew) activity.

- · Air filters for furnaces, air-conditioners, air purification devices, automobiles, recirculating air handling systems
- Air filters/materials
- Aquarium filter material
- · Bed sheets, blankets, and bedspreads
- Buffer pads (abrasive and polishing)
- · Carpets and draperies
- Cellulose sponges
- Concrete additive for sewer pipes, manholes and concrete sewer structures; not to be used in treatment of storm drains
- Concrete additive for repair and renewal of sewer pipes and manholes and concrete sewer structures, not to be used in treatment of storm drains
- Equipment parts, machines and surfaces (non-food contact)
- Exterior walls (such as stone, concrete, brick)
- Fiberfill for upholstery, sleeping bags, apparel, where the fiber is cotton, natural down, nylon, polyester, rayon, or wool

PAGE 3 - MASTER LABEL FOR GOLDSHIELD ®5

- Fiberglass ductboard
- Fire hose fabric
- Humidifier belts
- Mattress pads and ticking
- Mens underwear and outerwear
- Non-woven disposable diapers
- Non-woven polyester
- Outerwear apparel (jackets, sweaters, sweatshirts, coats, raincoats, overcoats, jerseys, ponchos)
- GOLDSHIELD ®5 can be used in paints and coatings as an in can preservative for protection of paint film and coating film. Types of paints and coatings include: latex indoor/outdoor paints and stains, wood-stains, architectural paints, lacquer and maintenance coatings, films, laminates and finishes including alkyd, urethane, enamel, epoxy, siloxaline, amino resins, textile coatings, extrusion coatings, architectural coatings and overlays, anti-corrosion coatings, fire-resistant coatings, aliphatic coatings, vinyl-ester and polyester coatings, gel coatings, amino resins, resins used as additive mixes for cement, epoxy laminating resins, and blends and copolymers thereof;
- · Polyurethane and cellulose foam for household, industrial, and institutional sponges and mops
- Polyurethane and polyethylene foam, when covered
- Polyurethane foam for packaging and cushioning in non-food contact applications
- Polyurethane foam used as a growth medium for non-food crops and plants
- Pre-moistened towelettes and tissue wipes (these do not impart pesticidal properties)
- Roofing materials defined as shingles, roofing granules, wood shakes, felt, stone and synthetic overcoats
- Sand bags, tents, tarpaulins, sails, and ropes
- Athletic and casual shoes
- Shoe insoles
- Shower curtains
- Socks comprised of nylon, nylon/orlon, cotton/nylon, linen/Lycra, acrylic/polypropylene/nylon/Lycra, wool/silk/nylon/Lycra and wool/acrylic/nylon/Lycra
- Textiles, woven and non-woven made from inert materials such as polypropylene, textured and spun bond, Kevlar®, polystyrene or polyester, polyester resin treated, polyester/spandex or nylon/spandex.
- Throw rugs
- Toweling made of 100 percent cotton, 100 percent polyester, and blends of the two fibers
- Toilet tank and seat covers
- Umbrellas
- Upholstery made of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefins, polypropylene, rayon, spandex, vinyl, wool
- Vacuum cleaner bags and filters
- Vinyl paper-wallpaper for non-food contact surfaces
- Disposable wiping cloths that can be used for multiple purposes such as dusting or washing furniture, cars, walls, windows, floors, appliances, dishes, counter tops; the wiping cloths do not impart pesticide properties
- Women's hosiery
- Women's intimate apparel

DIRECTIONS FOR USE

Approved commercial applications used in homes, offices, automobiles and institutions e.g., schools, hospitals, daycare centers, churches, correctional facilities

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Wear protective eyewear (goggles or face shield) and gloves when using this product. Dry treated areas and articles such as clothing before use. Remove children and pets from treated area until completely dry. Clean surfaces prior to application.

For Pump Spray Application: Dilute 8 ounces of GOLDSHIELD ®5 per gallon of water (2 oz. per quart; 1oz. per pint). Using pump sprayer, spray entire area 4"- 6"s from the surface making sure the surface is completely covered. Apply and then let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test for staining and color-fastness of fabrics and carpets by treating and drying a small, concealed area prior to

PAGE 4 - MASTER LABEL FOR GOLDSHIELD ®5

application. GOLDSHIELD ®5 treats approximately 200 square feet per diluted gallon of water. When treating coarser substrates, more GOLDSHIELD ®5 T may be required due to absorption. A fan may be used to assist in drying carpeting. For Commercial Spray Application: For commercial application equipment (i.e. carpet/upholstery steamers, rotary jet extraction cleaners, pressure sprayers) dilute 8 ounces of GOLDSHIELD ®5 per gallon of water (2 oz. per quart; 1oz. per pint); mix well. Apply and then let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test for staining and color-fastness of fabrics and carpets by treating and drying a small, concealed area prior to application. GOLDSHIELD ®5 treats approximately 200 square feet per diluted gallon of water. When treating coarser substrates, more GOLDSHIELD ®5 may be required due to absorption. Dry carpet areas and surfaces before re-entry and dry articles before use. A fan may be used to assist in drying carpeting.

For Dipping/Soaking Application: Use appropriate sized wash basin or tub for dipping/soaking the item you are treating. Use enough GOLDSHIELD ®5 solution to completely submerge item. Dilute 8 ounces of GOLDSHIELD ®5 per gallon of water (2 oz. per quart; 1oz. per pint); mix well. Completely submerge item in solution for 3 minutes. Remove item and dry. Test for staining and color-fastness of fabrics by treating and drying a small, concealed area prior to application. Do not reuse solution after dipping/soaking.

The substrate can be dried at room temperatures or at temperatures to a maximum of 160° C (320° F), for example in a clothes dryer. Remove excess liquid before attempting to dry in a clothes dryer. If necessary, reapply *GOLDSHIELD* ®5 every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.

Approved commercial applications in homes, offices, automobiles and institutions e.g., schools, hospitals, day care centers, banks, churches, correctional facilities

The active ingredient in GOLDSHIELD ®5 is effective against odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae as a static agent.

GOLDSHIELD ®5 can be used as a final bacteriostatic finish on the following items to impart bacteriostatic/fungistatic (mold and mildew) activity.

- Air filters for furnaces, air-conditioners, air purification devices, automobiles, recirculating air handling systems
- Air filters/materials
- Aquarium filter material
- Bed sheets, blankets, and bedspreads
- Buffer pads (abrasive and polishing)
- Carpets and draperies
- Cellulose sponges
- Equipment parts, machines and surfaces (non-food contact)
- Exterior walls(such as stone, concrete, brick)
- Fiberfill for upholstery, sleeping bags, apparel, where the fiber is cotton, natural down, nylon, polyester, rayon, or wool
- Fiberglass ductboard
- Fire hose fabric
- Humidifier belts
- Mattress pads and ticking
- Mens underwear and outerwear
- Non-woven polyester
- Outerwear apparel (jackets, sweaters, sweatshirts, coats, raincoats, overcoats, jerseys, ponchos)
- Polyurethane and cellulose foam for household, industrial, and institutional sponges and mops
- Polyurethane and polyethylene foam, when covered
- Polyurethane foam for packaging and cushioning in non-food contact applications
- Polyurethane foam used as a growth medium for non-food crops and plants
- · Roofing materials defined as shingles, roofing granules, wood shakes, felt, stone and synthetic overcoats
- · Sand bags, tents, tarpaulins, sails, and ropes
- Athletic and casual shoes
- Shoe insoles
- Shower curtains
- Socks comprised of nylon, nylon/orlon, cotton/nylon, linen/Lycra, acrylic/polypropylene/nylon/Lycra, wool/silk/nylon/Lycra and wool/acrylic/nylon/Lycra

PAGE 5 - MASTER LABEL FOR GOLDSHIELD ®5

- Textiles, woven and non-woven made from inert materials such as polypropylene, textured and spun bond, Kevlar®, polystyrene or polyester, polyester resin treated, polyester/spandex or nylon/spandex.
- Throw rugs
- · Toweling made of 100 percent cotton, 100 percent polyester, and blends of the two fibers
- Toilet tank and seat covers
- Umbrellas
- Upholstery made of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefins, polypropylene, rayon, spandex, vinyl, wool
- Vacuum cleaner bags and filters
- Vinyl paper-wallpaper for non-food contact surfaces
- Disposable wiping cloths that can be used for multiple purposes such as dusting or washing furniture, cars, walls, windows, floors, appliances, dishes, counter tops; the wiping cloths do not impart pesticide properties
- Women's hosiery
- Women's intimate apparel

DIRECTIONS FOR USE For homeowner applications

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Wear protective eyewear (goggles or face shield) and gloves when using this product. Dry treated areas and articles such as clothing before use. Remove children and pets from treated area until completely dry. Clean surfaces prior to application.

Approved homeowner uses

The active ingredient in GOLDSHIELD ®5 is effective against odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae as a static agent. GOLDSHIELD ®5 can be used as a final bacteriostatic

finish on the following items to impart bacteriostatic/fungistatic (mold and mildew) activity.

finish on the following items to impart bacteriostation	Pest controlled	Dilution Rate	Method of Applic
Bed-sheets, blankets, bedspreads, curtains, draperies (washable only), underwear, socks, intimate apparel, hosiery, throw rugs, toweling, toilet tank covers, shower curtains, shoe insoles, outerwear apparel (jackets, sweaters, sweatshirts, coats, raincoats, overcoats, jerseys, ponchos). GOLDSHIELD @5 can be applied to fabrics made of acetates, acrylics, cotton, fiberglass, linen, Lycra, nylon, orlon, polyester, polyethylene, polyolefins, polypropylene, rayon, silk, spandex, vinyl, and wool	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	8 oz./ gallon 2 oz./ quart 1 oz./pint	DIP/SOAK: Dilute GOLDSHIELD ®5 in w sized wash basin or tub for dipping/soaking enough GOLDSHIELD ®5 solution to cor item in solution for 3 minutes. Remove Drying may be attained by dripping dry c treated item. For larger items (e.g., bed place in washing machine on spin cycle to liquid. Test staining and color-fastness of and drying a small concealed area prior solution after dipping/soaking. Dry treated a can be hang-dried at room temperature or of 160 °C (320 °F); (for example in a clothe GOLDSHIELD ®5 every three months discoloration due to bacteria, mold stains, a SPRAY: Dilute GOLDSHIELD ®5 in wate to application. Using a trigger pump spratthe entire surface area 4"-6" from the surfacempletely covered. Let stand until dry or dry with cloth or sponge. If spotting occ sponge. Test staining and color-fastness or small concealed area prior to application.
	Pest controlled	Dilution Rate	discoloration due to bacteria, mold stains, a Method of Applic
Air filters and air filter material for Furnaces, air conditioners Air purification systems Automobiles Recirculating air handling systems Vacuum cleaner filters Aquariums	Odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae	8 oz./ gallon 2 oz./ quart 1 oz./pint	SPRAY: Dilute GOLDSHIELD ®5 in wa filters, remove filter from the unit. Usin pressure sprayer, spray the entire surface making sure the surface is completely cove until dry. If necessary, reapply GOLDSHI when odor, staining and discoloration due t stains, and algae stains return.
	Pest controlled	Dilution Rate	Method of Applic
Carpeting	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	8 oz./ gallon 2 oz./ quart 1 oz./pint	SPRAY: Dilute GOLDSHIELD ®5 in we carpet surface. Using a trigger pump spra the entire surface area 4"- 6" from the surfacempletely covered. For rotary jet ex steamers, add the diluted GOLDSHIEL cleaning tank, then operate the equimanufacturer's instructions. Apply and the staining and color-fastness of carpets by concealed area prior to application, approximately 200 square feet per diluted

			coarser substrates (e.g., wool carpeting), be required due to absorption. Dry carpet entry. A fan may be used to assist in dryir and pets from treated area until complete GOLDSHIELD ®5 every three months discoloration due to bacteria, mold stains, a
	Pest controlled	Dilution Rate	Method of Applic
Mattress pad and mattress ticking and upholstery composed of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefins, polypropylene, rayon, spandex, vinyl, wool; fiberfill to be used in upholstery, sleeping bags, apparel, where the fiber is cotton, natural down, nylon, rayon or wool	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	8 oz./ gallon 2 oz./ quart 1 oz./pint	SPRAY: Dilute GOLDSHIELD ®5 in w prior to application. Using a trigger pump starea 4"- 6" from the surface making sucovered. Apply and then let stand until c wipe dry with cloth or sponge. If spotting c sponge. Test staining and color-fastness or small concealed area prior to application pads and ticking do not soak. Remove c area until completely dried. If necessary every three months or when odor, stain bacteria, mold stains and mildew stains retu
	Pest controlled	Dilution Rate	Method of Applic
Tents, tarpaulins, sails, ropes.	Odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae	8 oz./ gallon 2 oz./ quart 1 oz./pint	SPRAY: Dilute GOLDSHIELD ®5 in wate to application. Using a trigger pump sprar the entire surface area 4"-6" from the surface completely covered. Let stand until dry or dry with cloth or sponge. If spotting occ sponge. Test staining and color-fastness or small concealed area prior to applica GOLDSHIELD ®5 every three months discoloration due to bacteria, mold stains, return.
			DIP/SOAK: Dilute GOLDSHIELD ®5 in w appropriate sized wash basin or tub for dipperenting. Use enough GOLDSHIELD ®5 is submerge item. Keep item in solution for the and wring excess liquid. Test staining and content treating and drying a small concealed area preuse solution after dipping/soaking. Dry tree Substrates can be hang-dried at room temp maximum of 160 °C (320 °F); (for example in excess liquid before attempting to dry in a content of the stain of the stain stains return.
	Pest controlled	Dilution Rate	Method of Applic
Roofing materials (such as shingles, roofing granules, wood shakes, felt, stone, synthetic overcoats) Exterior walls (such as stone, concrete, brick)	Odor causing bacteria, bacteria which cause staining and discoloration,	8 oz./ gallon 2 oz./ quart 1 oz./pint	SPRAY: Dilute GOLDSHIELD ®5 in wate or wall is clean prior to application. Using entire surface area 6"-12" from the surface completely covered. After applying the dil ®5 let stand until dry. GOLDSHIELD

	fungi (mold and mildew), and algae		square feet of roofing or wall per diluted reapply GOLDSHIELD ®5 every three m and discoloration due to bacteria, mold statistics return.
	Pest controlled	Dilution Rate	Method of Applic
Buffer pads (polishing and abrasive), Polyurethane and cellulose foam for household sponges and mops, vacuum cleaner bags, umbrellas, casual shoes, athletic shoes	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	8 oz./ gallon 2 oz./ quart 1 oz./pint	SPRAY: Dilute GOLDSHIELD ®5 in water to application. Using a trigger pump spraye the entire surface area 4*-6* from the surface completely covered. Let stand until dry or led dry with cloth or sponge. If spotting occurs, sponge. If necessary, reapply GOLDSHIEL when odor, staining and discoloration due to mildew stains return.
	Pest controlled	Dilution Rate	Method of Applic
Tubs, glazed tiles, vanity tops, shower curtains, shower stalls (areas), sinks, washable walls, wall paper for non-food contact, floors, window sills, cabinets, garbage cans, appliances, refrigerators (exterior), fiberglass, formica, glazed tiles, glazed porcelain, synthetic marble, plastic, vinyl	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	8 oz./ gallon 2 oz./ quart 1 oz./pint	SPRAY: Dilute GOLDSHIELD ®5 in was pump sprayer, spray the entire surface making sure the surface is completely coving stand 3 minutes and wipe dry with cloth of wipe with moist cloth or sponge. If necessal every three months or when odor, stain bacteria, mold stains, and mildew stains retrieved.

MOLD, MILDEW, ODOR PROTECTOR AND INHIBITOR GOLDSHIELD @5 is an antimicrobial agent effective against odor causing bacteria.

GOLDSHIELD @5 is an antimicrobial agent effective against bacteria which cause staining and discoloration.

GOLDSHIELD @5 is an antimicrobial agent effective against fungi (mold and mildew).

GOLDSHIELD @5 is an antimicrobial agent effective against algae.

GOLDSHIELD @5 an antimicrobial agent, controls the source of odors on surfaces in the home, in the bathroom, in the kitchen. Bacteriostatic, fungistatic (mold and mildew), algaestatic.

GOLDSHIELD @5 an antimicrobial agent, inhibits smelly odors caused by mold and mildew that can grow even in the cleanest of homes.

GOLDSHIELD ®5, an antimicrobial agent, inhibits the growth of odor causing bacteria.

Effective on hard non-porous washable bathroom and kitchen surfaces and fixtures around the home.

Effective on modern hard non-porous washable surfaces made of fiberglass, glazed porcelain, Formica®, stainless steel, synthetic marble.

Imparts microbiostatic properties.

Use on carpet and upholstery to inhibit odor causing bacteria, bacteria which cause staining and discoloration, and fungi

Unscented.

Use on carpet and upholstery to inhibit the growth of odor causing bacteria.

Use on carpet and upholstery to inhibit the growth of bacteria which cause staining and discoloration.

Use on carpet and upholstery to inhibit the growth of fungi (mold and mildew).

Use on carpet and upholstery to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae.

Provides an invisible microbiostatic coating to inhibit the growth of odor causing bacteria.

Provides an invisible microbiostatic coating to inhibit the growth of bacteria which cause staining and discoloration.

Provides an invisible microbiostatic coating to inhibit the growth of fungi (mold and mildew).

Provides an invisible microbiostatic coating to inhibit the growth of algae.

Provides an invisible microbiostatic coating to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae.

Prevents deterioration caused by bacteria and fungi (mold and mildew).

Inhibits deterioration caused by bacteria.

Resists development of microbial odors.

Resists development of stains and discoloration due to bacteria.

Resists development of stains due to fungi (mold and mildew).

Resists stains due to algae.

Resists development of microbial odors, stains and discoloration due to bacteria, fungi (mold and mildew), and algae.

PAGE 9 - MASTER LABEL FOR GOLDSHIELD ®5

Provides/creates an invisible barrier to inhibit the growth of odor causing bacteria.

Provides/creates an invisible barrier to inhibit the growth of bacteria which cause staining and discoloration.

Provides/creates an invisible barrier to inhibit the growth of fungi (mold and mildew).

Provides/creates an invisible barrier to inhibit the growth of algae.

Provides/creates an invisible barrier to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae.

Provides/creates an invisible barrier to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

Pesticide Storage: Store in original, tightly closed containers below 30°C (86°F) and above 0°C (32°F) in a secure area inaccessible to children and away from food or feed.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. **[For homeowner use the statement will read:** "Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site."]

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke. [For homeowner use statement will read: "Container Disposal: Securely wrap original container in several layers of newspaper and discard in trash."]

Note: Any claims for paint use must be for the preservative of the paint in the can. GOLDSHIELD ®5 is to be used as an in can preservative for paints to control the growth of odor causing bacteria, bacteria which causes staining and discoloration, fungi (mold and mildew) and algae.

FOR MORE INFORMATION CONCERNING THIS PRODUCT, PLEASE CONSULT THE MATERIAL SAFETY DATA SHEET (MSDS). THE MSDS CAN BE OBTAINED BY WRITING: AP Goldshield LLC, 9570 Pan American Dr., El Paso Texas, 79927 or emailing: customerservice@goldshieldtech.com

IMPORTANT: WARRANTY AND DISCLAIMER INFORMATION

AP GOLDSHIELD, LLC warrants that the product conforms to its chemical description and is reasonably fit for the purposes stated in this bulletin when used in accordance with directions under normal conditions of use; but this warranty of fitness for a particular purpose does not extend to the use of this product contrary to bulletin instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to the seller, and buyer assumes the risk of any such use.

AP GOLDSHIELD LLC SPECIFICALLY DISCLAIMS ANY OTHER EXPRESS OR IMPLIED WARRANTY, INCLUDING THE WARRANTY OF MERCHANTABILITY

A. Lowell Snow Consultant

6981 SCENIC POINTE PLACE MANASSAS, VIRGINIA 20112

PHONE: 703-791-7955

FAX: 703-791-0370 Mobile: 703-915-8866 E-MAIL:

ALSNOW@COMCAST.NET

January 12, 2012

Document Processing Desk (REGFEE) Office of Pesticide Programs (7504P) U. S. Environmental Protection Agency 1200 Pennsylvania Avenue, NW Washington, DC 20460

Attn: Velma Noble PM 31

Attached are Form 8570-1, 5 copies of the proposed amended label and an Authorization Letter for the author. AP Goldshield has EPA Reg. No. 85556-1 and is Amending the registration as indicated.

Please contact me if any further information is needed for your review.

a. Lowell Ingn

A. Lowell Snow



AP Goldshield LLC

9570 Pan American Dr. El Paso, Texas, 79927

915.858.0971 Texas P.

516.674.4085 NY P

December 7, 2009

Ms. Maureen T. Sherrill]
Document Processing Desk COADR)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
1 Potomac Yard
Room SF 4900
277 South Crystal Drive
Arlington VA 22202

Re: Representative

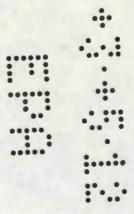
Dear Ms. Sherrill

This letter authorizes A. Lowell Snow 6981 Scenic Pointe Place Manassas VA 20112 to act as AP Goldshield LLC's representative in all registration matters. This authorization shall remain in effect until such time as AP Goldshield LLC notifies EPA, in writing, of cancellation.

Should you have any questions, please call.

Sincerely,

Ted Shlisky COO



Please read instructions e	n reverse before comple	ting form.		Form Approve	d. OMB No. 2070	-0060	Print Form	
≎EPA	Environmenta	United States I Protection ington, DC 204		×	Registration Amendment Other	211	PP Identifier Number	
		Applicatio	n for Pesticio	de - Sectio	n I			
1. Company/Product Num 85556-1	ber			Product Manage Noble			seed Classification	
4. Company/Product (Nam Goldshield 5	Company/Product (Name) Goldshield 5					X	one Restricted	
5. Name and Address of Applicant (Include ZIP Code) APGoldshield 9570 Pan American Drive 9570 El Paso, TX 79927			6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No.					
Check If to	nis is a new address		Produ	ct Name				
			Section - I					
X Amendment - Expl Resubmission in re Notification - Exple	sponse to Agency lette	r dated		Final printed lai Agency letter o "Me Too" Appl Other - Explain	lication.			
Material This Product \ Child-Resistant Packaging			Section - I		2. Type of Co	ntainer		
× No	× No		Yes No		X Plastic Glass			
 Certification must be submitted 	If "Yes" Unit Packaging wgt	No. per container	If "Yes" Package wgt			Paper Other (Specify)		
S. Location of Net Conten	ts Information Container	4. Size(s) Ret	ail Container	8 24	Location of Label On Label On Labeling	70.00	nying product	
6. Manner in Which Label	is Affixed to Product	X Lithog Paper Stenci	raph glued led	Other _				
			Section - I'	V				
1. Contact Point (Comple	te items directly below	for identification	n of individual to b	e contacted, if n	ecessary, to proce	ess this ap	plication.)	
Name A.Lowell Snow			Title Agent for AP Goldshield Telep			elephone N	none No. (Incidde Area Code)	
	stements I have made or any knowingly false or le law.		all attachments th			pte.	Date Application Received (Stamped)	
2. Signature Rowell	Inow		3. Title Agent for AP Goldshield					
4. Typed Name A. Lowell Snow			5. Date Jan 12, 2012					

EPA Form 6570-1 (Rev. 8-94) Previous editions are obsolets.

White - EPA File Copy (original) Yellow - Applicant Copy

Material Sent for Data Extraction

Reg # 85556-/ Description: ____ Material(s) Sent to Data Extraction Contractors: New Stamped Label Dated _____ Motification Dated _____ New CSF(s) Dated _____ Other: Decision #: 462/39 Other Action/Comments:____ Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900). Reviewer: E. Oiguenblik Phone: 347-0199 Division: 49 Date: Created February 3, 2011

A.Lowell Snow Consulting Agent for AP Goldshield LLC 6981 Scenic Pointe Place Manassas, VA 20112

APR - 5 2012

SUBJECT:

Goldshield 5

EPA Registration Number: 85556-1 Application Date: January 12, 2012

Receipt Date: March 5, 2012

Dear Mr. Snow:

This letter acknowledges receipt of the notification identified above submitted under the provisions of section 3 (c) 9 of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended and PR Notice 98-10 and 40 CFR 152.46.

• Addition of alternate brand name "Veterans Shield 5" per PR Notice 98-10.

Based on a review of the submitted information, this notification is acceptable. Your proposed change will be made part of the record for this file.

General Comments

Should you have any questions concerning this letter, please contact Emilia Oiguenblik at (703) 347-0199 or Velma Noble at (703) 308-6233.

Sincerely,

Velma Noble

Product Manager (31)

Regulatory Management Branch I Antimicrobials Division (7510P)

A. Lowell Snow Consultant

6981 SCENIC POINTE PLACE MANASSAS, VIRGINIA 20112

PHONE: 703-791-7955

FAX: 703-791-0370 Mobile: 703-915-8866 E-MAIL:

ALSNOW@COMCAST.NET

January 12, 2012

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Attn: Velma Noble PM 31

Attached are Form 8570-1 and an Authorization Letter for the author. AP Goldshield has EPA Reg. No. 85556-1 and is by Notification is identifying an alternate brand name.

Please contact me if any further information is needed for your review.

Sincerely,

a. Lowell Anon!

A. Lowell Snow

CERTIFICATION STATEMENT FOR 8556-1 Submission

"Notification of label change per PR Notice 1998-10. This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156. Update to Storage and Disposal section only. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA."

Signature

A. Lowell Snow

4/3/2012

Date

Please read instructions on	reverse before comp	form.		Form Approve	d. 0100. 20	070-0060	Print Form		
≎EPA	Environmenta	United States Il Protection ington, DC 204		×	Registra Amendr Other		OPP Identifier Number		
		Applicatio	n for Pestici	de - Sectio	n I				
1. Company/Product Numb 85556-1	er			2. EPA Product Manager Velma Noble			posed Classification		
4. Company/Product (Name Goldshield 5	. Company/Product (Name) Goldshield 5						None Restricted		
5. Name and Address of Applicant (Include ZIP Code) AP Goldshield LLC 9570 Pan American Dr. El Paso Texas 79927			6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No.						
Check if th	is is a new address		Produ	ct Name					
			Section -	ll					
Amendment - Explain Resubmission in real Notification - Explain	ponse to Agency lette	r deted		Final printed lai Agency letter o "Me Too" Appl Other - Explain	lated lication.	• to			
1. Material This Product W Child-Resistant Packaging	III Be Packaged in: Unit Packaging		Section - Water Soluble P		2. Type of	Container			
Yes*	Wes No	No	Yes No No per			Metal Plactic Gless Paper			
Certification must be submitted	Unit Packaging wgt	No. per L. container	Package wgt			Other (Specify)			
Location of Net Content	Information Container	4. Size(s) Ret	ail Container	5.	Location of Laboration of Laboration of Laboration of Laboration of Laboration (Laboration of Laboration of Labora	1	enying product		
6. Manner in Which Label i	Affixed to Product	Lithog Paper Stenci	raph glued led	Other _					
			Section - I	V					
1. Contact Point Complet	e items directly below	for identificatio	n of individual to b	e contacted, if n	ecessary, to pr	ocess this a	pplication.)		
Name A. Lowell Snow			Title Agent for AP Goldshield				Telephone No. (Include Area Code) 703-791-7955		
I certify that the state I acknowledge that a both under applicable	aments I have made or any knowingly false or a law.	Certifica n this form and misleading stat	all attachments th	ereto are true, e ishable by fine o	ccurate and cor r imprisonment	mplete.	8. Date Application Received (Stanped)		
2. Signature (L. C. BO)	rell Snow		3. Title Agent for AP Goldshield						
4. Typed Name A. Lowell Snow			5. Dete Jan 12, 2012						

EPA Form 8570-1 (Rev. 8-94) Previous editions are obsolete.

White - EPA File Copy (original) Yellow - Applicant Copy



AP Goldshield LLC

9570 Pan American Dr. El Paso, Texas, 79927

915.858.0971 Texas P.

516.674.4085 NY P

December 7, 2009

Ms. Maureen T. Sherrill]
Document Processing Desk COADR)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
1 Potomac Yard
Room SF 4900
277 South Crystal Drive
Arlington VA 22202

Re: Representative

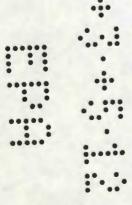
Dear Ms. Sherrill

This letter authorizes A. Lowell Snow 6981 Scenic Pointe Place Manassas VA 20112 to act as AP Goldshield LLC's representative in all registration matters. This authorization shall remain in effect until such time as AP Goldshield LLC notifies EPA, in writing, of cancellation.

Should you have any questions, please call.

Sincerely,

Ted Shlisky COO



Mr. A Lowell Snow Consulting Agent for AP Goldshield LLC 6981 Scenic Pointe Place Manassas, Virginia 20112

JUN -8 2010

Subject:

Goldshield 5

EPA Registration Number 85556-1 Application Dated January 5, 2010 EPA Received Date January 15, 2010

Dear Mr. Snow:

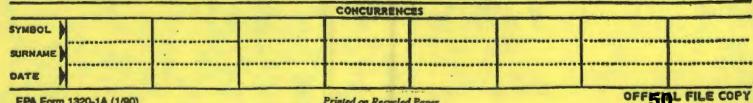
The following amendment submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable.

Proposed Amendment:

Submitted a Confidential Statement of Formula (CSF), for the basic formulation for the non-integrated end use product

Product Chemistry:

- 1. The CSF, dated 01/05/10, for the basic formulation is used as reference.
- 2. The CSF, dated 04/28/10, for the basic formulation is revised and accepted.
- The CSF and the label have the same nominal.
- 4. All certified limits meet the EPA standard certified limits.
- 5. You indicated that this amendment is a variation in the basic formulation, by adding a new supplier for the active ingredient (AI). This proposed amendment will allow the customization of your product needs.



EPA Form 1320-1A (1/90)

- 6. The additional supplier for the active ingredient (AI), has been added to the agency database.
- 7. The label, dated 06/04/08, is used as reference.

General Comments:

Should you have any questions or comments concerning this letter, please contact Drusilla Copeland at (703) 308-6224 or Velma Noble at (703) 308-6233.

Sincerely,

Velma Noble

Product Manager (31)

Regulatory Management Branch I Antimicrobials Division (7510P)

Enclosure: Product Chemistry review approved dated 4/28/10



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF
PREVENTION,
PESTICIDES AND
TOXIC
SUBSTANCES

April 28, 2010

DP BARCODE:

D375835

MRID:

N/A

SUBJECT:

Goldshield 5

REG. NO. OR FILE SYMBOL:

85556-1

DOCUMENT TYPE:

Product Chemistry Review

Manufacturing-use []

OR

End-use Product [X]

INGREDIENTS (PC Codes)

3-(trihydroxysilyl) propyl dimethyl octadecyl ammonium

chloride (107403)

CAS Number

199111-50-7

TEST LAB:

N/A

SUBMITTER:

A P Goldshield

GUIDELINE:

N/A

COMMODITIES:

Formulation

REVIEWER:

Salvador Rodríguez

ORGANIZATION:

AD

APPROVER:

Karen P. Hicks

APROVED DATE: 05/05/10

STATE STATE

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

PESTICIDES AND TOXIC SUBSTANCES

April 28, 2010

MEMORANDUM

Subject: Product Chemistry Review for EPA Reg # 85556-1 From: Salvador Rodríguez, Chemist Product Science Branch, CT Team Antimicrobials Division (7510P) Thru: Karen P. Hicks, CT Team Leader Product Science Branch Antimicrobials Division (7510P) Drusilla Copeland/ Velma Noble To: PM Team 31 Antimicrobials Division (7510P) **APPLICANT:** A P Goldshield LLC. Action code: 362 Due date: 06/13/10 **Product Formulation** Active Ingredient(s) % by wt

> 85556_1_D375835_APGoldshieldLLC Page 2 of 3

3-(trihydroxysilyl) propyl dimethyl octadecyl ammonium chloride5.0

BACKGROUND:

The registrant, A P Goldshield., has submitted a Confidential Statement of Formula (CSF) for the basic formulation for the non-integrated end-use product, **Goldshield 5.** The registrant is adding an alternate supplier for the active ingredient (AI). The Product Chemistry Reviewer has received the following documents:

- Confidential Statements of Formula (CSFs) dated 01/05/10, and 04/28/10, for the basic formulations.
- A cover letter, dated 01/05/10.
- Application for pesticide amendment, dated 01/05/10.
- Fee of service, dated 03/15/10.
- Data matrix of The Technical Analysis of Formulation, previously accepted by EPA on 01/24/08.

FINDINGS:

- 1. The CSF, dated 01/05/10, for the basic formulation is used as reference.
- 2. The CSF, dated 04/28/10, for the basic formulation is revised.
- 3. The CSF and the label have the same nominal.
- 4. All certified limits meet the EPA standard certified limits.
- 5. The registrant indicated that this amendment is a variation in the basic formulation, by adding a new supplier for the active ingredient (AI). This proposed amendment will allow the customization of their product needs.
- 6. The additional supplier for the active ingredient (AI), has been added to the agency database.
- 7. The label, dated 06/04/08, is used as reference.

CONCLUSIONS:

The CSF, dated 04/28/10, for the basic formulation is acceptable. The proposed technical amendment is acceptable. The justification for this amendment is acceptable. The technical analysis of formulation has been previously approved on 06/02/08.

DATA PACKAGE BEAN SHEET

Date: 25-Mar-2010
Page 1 of 1

Decision #: 430855

DP #: (375835)

NON PRIA

Parent DP #:

Submission #: 869410

* * * Registration Information * * *

Registration:	85556-1 - GOLD SHIELD 5
Company:	85556 - AP GOLDSHIELD LLC
Risk Manager:	RM 31 - Velma Noble - (703) 308-6233 Room# PY1 S-8855
Risk Manager Reviewer:	Drusilla Copeland DCOPELAN
Sent Date:	Calculated Due Date: 13-Jun-2010 Edited Due Date:
Type of Registration:	Product Registration - Section 3
Action Desc:	(362) FORMULA CHANGE;TECHNICAL;
Ingredients:	107401, 1-Octadecanaminium, N,N-dimethyl-N-(3-(trimethoxysilyl)propyl)-, chloride(5%)
	* * * Data Package Information * * *
Expedite:	○ Yes ● No Date Sent: 25-Mar-2010 Due Back:
DP Ingredient:	107401, 1-Octadecanaminium, N,N-dimethyl-N-(3-(trimethoxysilyl)propyl)-, chloride
DP Title:	
CSF Included:	○ Yes ● No Label Included: ○ Yes ● No Parent DP #:
Assigned To	O Date In Date Out
Organization: AD / P	PSB 3/26/10 Last Possible Science Due Date: 29-Apr-2010
Team Name: CTT	3/26/10 05/04/10 Science Due Date: 5/11/10
Reviewer Name:	Dal Vac CR \$10, 04/28/10 Sub Data Package Due Date: 5/25/16
ctor Name:	04/05/10
	* * * Studies Sent for Review * * *
	No Studies
	* * * Additional Data Package for this Decision * * *
	No Additional Data Packages
	* * * Data Package Instructions * * *
Registrant has submitte	
Phease	pul jaclat + 14bel

3/24/10



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

January 5, 2010

OFFICE OF PREVENTION, PESTICIDES A TOXIC SUBSTANCES

A. LOWELL SNOW
A. LOWELL SNOW CONSULTING, AGENT FOR
AP GOLDSHIELD LLC
6981 SCENIC POINTE PLACE
MANASSAS, VA 20112

Dear Registrant:

Your request for a change in your Official EPA Company Name and Address record been completed. For your confirmation the Official EPA Company Name and Address record EPA Company Number: 85556 is listed below.

A. LOWELL SNOW AP GOLDSHIELD LLC 9570 PAN AMERICAN DRIVE EL PASO, TX 79927

Agent Address:

A. LOWELL SNOW
A. LOWELL SNOW CONSULTING, AGENT FOR
AP GOLDSHIELD LLC
6981 SCENIC POINTE PLACE
MANASSAS, VA 20112

Any future changes in company name and/or address or changes in designation/withdrawal of authorized agent should be directed to the following address. It c also be faxed to (703) 305-7670.

Document Processing Desk (COADR)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460



If you have any questions, please call me at (703) 305-5411.

Sincerely,

M Lither OMply

M. Kathleen O'Malley Program Analyst Office of Pesticide Programs



A. Lowell Snow Consultant

6981 SCENIC POINTE PLACE MANASSAS, VIRGINIA 20112

PHONE: 703-791-7955

FAX: 703-791-0370 Mobile: 703-915-8866 E-MAIL:

ALSNOW@COMCAST.NET

January 5, 2010

Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Attn: Velma Noble PM 31

Attached are Form 8570-1, 8570-4 (2 pages) and an Authorization Letter for the author. AP Goldshield has EPA Reg. Nos. 85556-1 and 85556-2 for Goldshield 5 and Goldshield 75 respectively. The attached seeks to add an alternate supplier,

to the existing CSF for the Active Ingredient.

Please contact me if any further information is needed for your review.

Sincerely,

a. Lowell know

A. Lowell Snow



Please read instructions on I	everse before compl	eting form.		Form App	oved.	Q442 No. 2	070-0060	Print Form	
≎EPA	Environments	Uran States			×	Registra Amenda Other	ation	OPP Identifier Number	
		Application	n for Pestic	ide - Sec	tion	Ī		.	
1. Company/Product Number AP Goldshield / 85556				Velma Noble				Proposed Classification	
4. Company/Product (Name) AP Goldshield / Goldshield	ld 5 & Goldshield 7	5	PM# 31	PM#				None Restricte	
5. Name and Address of Applicant (Include ZIP Code) AP GoldShield 9570 Pan American Drive El Paso, TX 79927			(b)(i), to: EPA	85556-1 & 85556-2					
			Section -	11					
Check if this X Amendment - Explain Resubmission in resp Notification - Explain Explanation: Use addition as additional supply for a	onse to Agency lette below. nai page(s) if necesse		n I and Section II.)	Agency let "Me Too" Other - Exp	ter det Applic	etion.	e to		
			Section -	010					
1. Material This Product Will Child-Resistant Packaging X Yes*	Be Packaged In: Unit Packaging		Water Soluble	Packacia a		2. Type of	Cantalan		
Child-Resistant Packaging X Yes* No * Certification must	Yes No If "Yes" Unit Packaging wg	No. per	Yes No If "Yes" Package wat	No. per		×	Metal Plastic Glass Paper	Smarlfe A	
3. Location of Net Contents X Label		4. Size(s) Ret		Containe		cation of La	Other (S		
⊠ Label □ C	Container	8,16.22.32.6			E	On Labo	1	panying product	
6. Manner in Which Label is adhesive	Affixed to Product	X Lithog Paper Stenci	raph glued	Othe				<u> </u>	
		Stolic	Section -	IV				<u> </u>	
1. Contact Point (Complete	items directly below	for identification	on of individual to	be contected,	If nec	essary, to p	ocess this	application.)	
Manner in Which Label is adhesive 1. Contact Point Complete Name A. Lowell Snow			Title Agent for AP G	oldshield			Telephon 703-791	e No. (Include Area Code -7955	
I certify that the state I acknowledge that ar both under applicable	y knowingly false or		all attachments t					6. Date Application Received (Stamped)	
2. Signature	-www-		3. Title Agent for AP G	oldshield		politica transfer	•		
4. Typed Name A. Lowell Snow			5. Date 1/5/2010			***********	••••		

·**.59**



UNIT STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

March 16, 2010

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

A. LOWELL SNOW
A. LOWELL SNOW CONSULTING
AP GOLDSHIELD LLC
6981 SCENIC POINTE PLACE
MANASSAS, VA 20112-

PRODUCT NAME: GOLD SHIELD 5

COMPANY NAME: AP GOLDSHIELD LLC

OPP IDENTIFICATION NUMBER: EPA FILE SYMBOL: 85556-1 EPA RECEIPT DATE: 03/15/10

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Antimicrobials Division, Risk Management Team 31, at (703) 308-6233.

Sincerely,

P. K. Krosse

Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

September 2, 2009

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

MR. MURRY ZBOROWSKI AP GOLDSHIELD LLC 9570 PAN AMERICAN DRIVE EL PASO, TX 79927

Dear Mr. Zborowski:

Subject: Transfer of Pesticide Registrations and Data From Company Number 83075 to Company Number 85556

Pursuant to your request in your letter and transfer agreement of July 16, 2009, we have approved the transfer of the following registrations from NBS TECHNOLOGY, LLC, company number 83075 to AP GOLDSHIELD LLC, company number 85556.

The effective date of these changes is the date of this letter.

Registered Products	Old EPA Reg. No.	New EPA Reg. No.
GOLD SHIELD 5	83075-1	85556-1
GOLDSHIELD 75	83075-2	85556-2

You should indicate the new company designation, new EPA Registration Number and new Establishment Number (if it has changed) on the labeling at the next printing which should occur no later than 18 months after the effective date of this transfer. After 18 months, any product released for shipment must bear the new Registration Number and Establishment Number. If you intend to use the labels which currently appear on the transferor's product after the effective date of the transfer, but within the 18 month grace period, you must maintain complete and accurate records which identify by batch number, lot number, or other suitable description the quantities of such product bearing the transferor's label. Each container or package bearing the transferor's label which is released after the effective date of product registration transfer, must be clearly and accurately marked with the batch number, lot number or other descriptive designation used to identify the product in your records.

Supplemental distribution agreements of registered products do not transfer with the Section 3 registration. It is your responsibility as the registrant to notify any and all supplemental distributors of the transferred product(s) of this transfer agreement. If you wish to enter into supplemental distribution agreements of your product(s) under this new registration, the form "Notice of Supplemental Distribution of a Registered Pesticide Product," EPA Form 8570-5,

must be submitted to the Agency for each supplemental distributorship.

You are required to contact your local EPA Regional Office to determine what effect this transfer of pesticide registrations has on the pesticide production establishment registration.

It will not be necessary to submit labeling for review if the only changes are in the company designation and the EPA Registration Number. Other changes in the product and/or labeling may require EPA review and approval prior to distribution or sale of the product containing the new registration number. In any correspondence on these products always refer to the U.S. EPA Registration Number listed above.

The transferred registration will have the same status under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, 7 USC 136 et seq., as it had prior to the approval of this transfer.

When registrations are transferred from one company to a second company, all restrictions, data requirements, conditions (suspensions), and deadlines existing on the registrations are transferred with the registrations. The new company is responsible for adhering to or complying with all such restrictions, etc. on the acquired products.

In regard to deadlines, the transferee company is responsible for submitting all required data according to the schedules already established for the acquired products. Failure to do so will result in the issuance of a Notice of Intent to Suspend. Requests from transferee companies for additional time to submit, because they acquired the registration(s) after the 3(c)(2)(B) request was issued will not be granted. If a transferee company has other valid reasons for delays in the testing which were clearly outside of their control, then such requests for time extensions will be considered in accordance with the established procedures. Transfers occurring while a 3(c)(2)(B) request is being issued or during the 90-day response time are subject to the same conditions expressed above.

Registration is in no way to be construed as an endorsement or approval of these products by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with FIFRA.

Furthermore, the transfer of the subject registrations is approved under the condition that the annual maintenance fee obligation has been fully satisfied. The marginal maintenance fee is determined based solely on the total number of active section 3 and section 24(c) registrations held by the transferor. If the annual maintenance fee has not been fully satisfied, the transferee and transferor will be notified to comply within a specified time period or the affected registrations may be canceled.

The Agency acknowledges it has received a request for data transfer dated July 16, 2009 to transfer data ownership from the transferor to the transferee. The data transfer is effective the date of this letter. After this date AP GOLDSHIELD LLC will be considered the data owner. This action will not automatically reflect on the Data Submitters List. If you want to be added to the Data Submitters List, you must submit a request to:

Document Processing Desk (DSL)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

By copy of this letter we are informing the transferor of these changes. If you have any questions about this transfer approval please contact Louis Vaughn at (703) 308-8114.

Sincerely,

Steve Robbins, Chief

Information Services Branch

Information Technology & Resource Management Div. (7504P)

cc: TED SHLISKY and THOMAS HIGGINS

NBS TECHNOLOGY, LLC

157 SKUNKS MISERY ROAD, PO Box 428

LOCUST VALLEY, NY 11560-

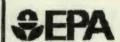
RE: L_83075_RAD_85556_09_02_2009.pdf

_ JUN-2-2009 12:03P FROM:

Please Read All Instructions Before Comp

167595309

FINIT P:2'4



Environmental Protection Agency

Office of Pesticide Programs (7505C) Washington, DC 20480

Notice of Supplemental Distribution of a Registered Pesticide Product

Instructions

After a registrent has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

ig this Form (Form must be typed) Firm Appro

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have

the concritence and signature of pont ore tedizmant and	Dig distriction.
EPA Registration Number of Product	Distributor Company Rumber
\$3075-1 AND 83075-2.	86349
	It distributor product labels
Name of Registered. Product thesic graduct name accepted by GNA)	Distributor Product Nature
GOLD Shield S+ Goldshield 75	BVS-AMS

Name and Address of Distributor (Type; include 20° code)	****
Bio-Vapor Systems LLC	*****
110 5 Hampton Crowley TX, 76036	
Commy IN 10000	*****
	•••
Read All Conditions	Before Signing
The contract of the contract o	*****
1. The distributor product must have the same compositi	ion on the basis analyst
	ckaged by the same person who manufactures and packages
the registered basic product.	credien by me seme became semo meaningment and discorder
	same claims as the basic product, provided, however, that
specific claims may be delated if by doing so, no other	
4. The product must remain in the manufacturer's unbrol	
	e basic product, followed by a hyphen and the distributor's
company number.	a passe broader, tous and at a subtracti and the didningstor d
	ress of the distributor qualified by such terms as "packed
for", "distributed by"; or "sold by" to show that	
7. All conditions of the basic registration apply equally to	
	ompliance with requirements placed on the basic product.
Distrib	
We intend our product under the Distributor Product Name and	reified above, subject to the conditions specified on this Nation.
Signature and Title of Dipathings	Date
PRES	6-2-09
4,00	10,00
Regis	erent .
I sures that the distributor memod phone may distribute and sall the Disc	aboth Product specified above, subject to the conditions specified on this
Alotico.	mare, sugar to the contracting of the
Signate pip price Trice of Regulary 1	- 1
1 Emmu 1 1 830 75-1 75	20.75.73 Date / C/ 0
1 Cmm 1 75 83075-178	6/17/09
PA Form \$570-5 Blov. 8-94) Provider adiabase see obsolets	



Environmental Protection Agency

Office of Pesticide Programs (7505C) Washington, DC 20460

Notice of Supplemental Distribution of a Registered Pesticide Product

Instructions

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product Distributor Company Number 83075-1 Note: Do not submit distributor product labels Name of Registered Product (basic product name accepted by EPA) Distributor Product Name Goldshield 5 or GS 5 Goldshield 5

ame and Address of Distributor (Type; include ZIP code)

AP Goldshield LLC 9570 Pan American Dr. El Paso, TX 79927

Read All Conditions Before Signing

- 1. The distributor product must have the same composition as the basic product.
- 2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
- 3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
- 4. The product must remain in the manufacturer's unbroken container.
- 5. The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.
- Distributor product labels must bear the name and address of the distributor qualified by such terms as "packed for...", "distributed by..."; or "sold by..." to show that the name is not that of the manufacturer.
- 7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor 6/2/1 manage/momber

agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

EPA Form 8570-5 (Rev. 8-94) Previous editions obsolete.

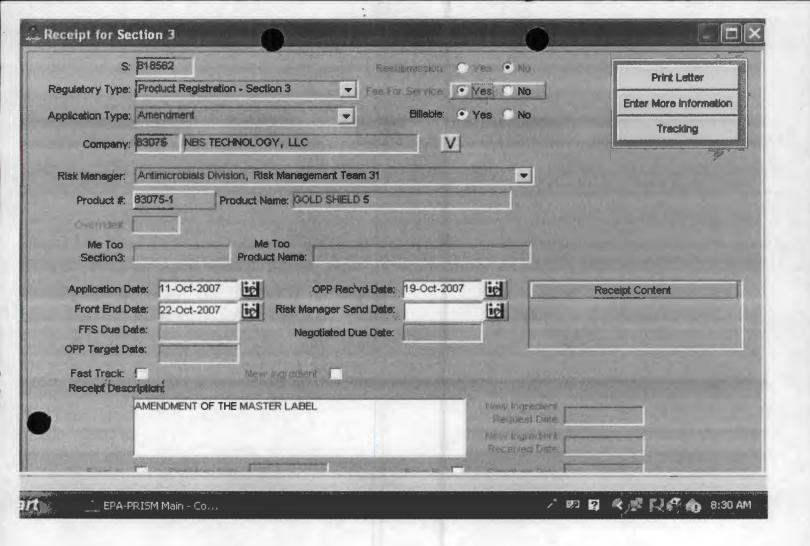
RISK ASSIGNMENT FORM Antimicrobial Division/Regulatory Management Branch II

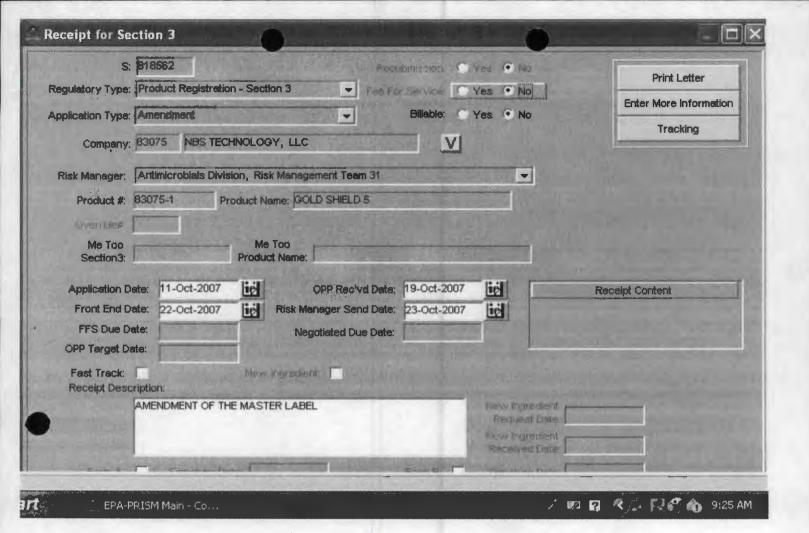
	T REVIEWER	: 1	nen		RMB	I TEA	M31			
Description	on of Action:	Lapela	wies			e Symbol/Re				
Decision No. 385400 Submission No. 818562 Fee for						for Service Action Code:				
FQPA Actic			Non-FQPA Action Code:			PRIA FEE AMOUNT:				
		DAY	A	HEMONTH		YEAR				
APPLICATIO	ON DATE	10		1						
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ATE RISK M	MANAGER ROM FRONT END									
DATE SENT	TO SCIENCE									
PRIA DUE D	DATE									
NEGOTIATED DUE DATE		1		1	2008					
Type of Data:	PSB Product Chemistry	PSB Acute Toxicology	PSB Efficacy	RASSB Environmental Fate	RASSB Ecological Effects	RASSB Chronic Toxicology	RASSB Exposur /Residue			
		,								
	Popelrevi				THERE					
	E PEL SELING	e√ - 61 €-CSF(S	S) €-DA		OTHERS					
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Fee for Service

{8185624~

This package includes the following	for Division			
This package includes the following				
New Registration	AD			
• Amendment				
	○RD			
Studies? Fee Waiver?	Risk Mgr. 31			
volpay % Reduction:	<u> </u>			
Receipt No. S-	818562			
EPA File Symbol/Reg. No.	83075-1			
Pin-Punch Date:	10/19/2007			
This item is NOT subject to F	FS action.			
Action Code:	Parent/Child Decisions:			
Requested:				
Granted:				
Amount Due: \$O -				
Reviewer: M. Q. T, mg	Date: 1()-22-07			
Remarks:				





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

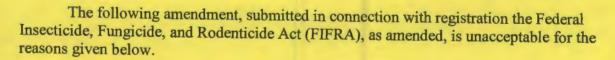
Ted Shlisky Chief Operating Officer NBS Technology, LLC 157 Skunks Misery Rd. P.O. Box 428 Locust Valley, NY 11560

Subject:

Goldshield 5

EPA Registration Number: 83075-1 Application Date: October 15, 2007 Receipt Date: October 19, 2007

Dear Mr. Shlisky,

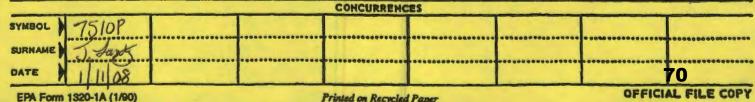


 Clarification of instructions for textile producers and textile finished product manufacturers

JAN 1 1 2008

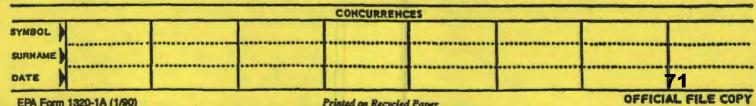
Deficiencies

- 1. On page three, you have proposed additional directions for use on textiles. These directions are incomplete, include textile items which are not approved for this use, and are not in agreement with PR Notice 2000-5 which describes the use of mandatory label language. Although information was exchanged via e-mail during this review process, this information was not adequate for the Agency to provide the missing directions for use. Address the following items by rewriting the directions for textiles on page three:
 - A. Delete "scrubs" as use on these garments has not been approved.
 - B. Provide mandatory language as per PR Notice 2000-5 including: "...or sheets apply via an exhaustion method in equipment such as..." "Launder the raw textile material or finished product as usual..." "Use a compatible nonionic detergent with Goldshield 5." "Use solution of Goldshield 5 in the amount of 3%..." and "No rinsing or scouring is required. Fabric can then be dried according to conventional methods, with heat settings at 180°-210° F."



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

- C. Provide a heading for this entire section such as: "Application of Goldshield to Fabric."
- D. Add additional information to the unclear statement: "Acetic Acid or Citric may be used to adjust the pH if necessary." Revise your directions to indicate if the water is to be tested prior to adding the Goldshield 5 and if so to what level the pH should be adjusted. If you intend for the diluted Goldshield 5 solution pH to be adjusted indicate this on the label and to what level the pH should be adjusted. Use mandatory language as per PR Notice 2000-5.
- E. Your last statement in this section refers to the use of Bromophenol Blue to determine the presence of Goldshield 5 on the treated fabric. This section is incomplete. This section must give the user clear directions as follows:
 - If this test is to be run on an item from a batch of treated textiles, indicate this as well as exactly how much Bromophenol Blue is added, whether the Bromophenol Blue is diluted, and whether the tested item must be discarded after the test.
 - If this test is to be run on the entire batch of treated textiles, indicate this as well as exactly how much Bromophenol Blue is added, whether the Bromophenol Blue is diluted, and whether the tested items must be discarded after the test.
 - You have indicated via e-mail that there are several situations where the Goldshield 5 may not bond to the textiles. You have not indicated what steps are to be taken if a batch of textiles is found to lack Goldshield 5. Add a section to your directions which indicates exactly what steps should be taken if bonding has not occurred. (May that batch of items be retreated or are they to be discarded? Should the parameters be altered for the next batch of treated textiles?) If retreatment is to occur, indicate exactly what steps are to be taken by the applicator at this point.
 - You have indicated that the post scour must be done correctly to eliminate bleach and avoid blocking of Goldshield 5. Your label mentions that a post scour is to occur but gives no specific directions. Provide detailed label directions for post scouring · including the timing of this process, as you have indicated that timing is an issue.
 - You have made mention of "specification protocols". Are there technical bulletins or other specification protocols associated with this product? All technical bulletins or other similar documents must be submitted to the Agency for review.



EPA Form 1320-1A (1/90)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

2. On page six in the "Approved commercial applications used in homes, offices, automobiles, and institutions..." section, you have proposed the same additional directions for use on textiles. These directions are not appropriate for these users as the equipment associated with this treatment is not available in homes, offices, churches, etc. Your cover letter also indicates that these instructions are not intended for these users. Thus, delete these four sections from the directions for use on pages six and seven.

General Comments

The Agency reserves a full review of the label until a revised label which includes complete directions for use is submitted. Use the guidance in PR Notice 2000-5 for mandatory language in the directions for use. Submit all technical bulletins and specification protocols for review. The Agency will re-review the revised sections of your label.

Should you have any questions or comments concerning this letter, please contact Tracy Lantz at (703) 308-6415.

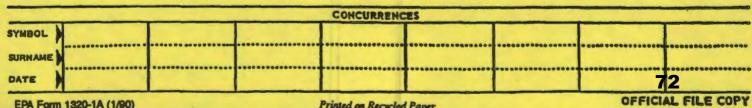
Sincerely,

Velma Noble

Product Manager (31)

Regulatory Management Branch I Antimicrobials Division (7510P)

7510P:T.Lantz:1/10/08:83075-1a



EPA Form 1320-1A (1/90)



Goldshield^{TM5}

MICROBIOSTATIC AGENT

A Silicone Quaternary Ammonium Salt

Active Ingredient: Other Ingredients:	3-(Trihydroxysilyl)propyldimethyloctadecyl ammonium chloride	5.0% 95.0%
TOTAL INGREDIENTS:	WEED OVE OF DE LOY OF CHAIN DRIVE	100.0%
	KEEP OUT OF REACH OF CHILDREN	
EPA Reg. No. 83075-1	WARNING EPA EST. 82816-SC-001	

NET CONTENTS: 2, 4, 8, 16, 20, 22, or 36 fluid oz.; 1, 5, 55, 150, or 275 gal.

Lot No.

FIRST AID

Have the product container or label with you when calling the poison control center or doctor, or going for treatment.

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
- Call poison control center or doctor for treatment advice.

IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.
- Call a poison control center or doctor for further treatment advice.

IF ON SKIN:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

A microbiostatic agent is an agent that inhibits the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae. This product does not protect users or others against food-borne or disease-causing bacteria.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING. Causes substantial but temporary eye injury. Harmful if absorbed through skin or inhaled. Do not get in eyes. Avoid contact with skin and avoid breathing vapor. Wear protective eyewear (goggles or face shield). Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

<u>Commercial and industrial uses:</u> This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

De-activation may be required during clean up if a spill occurs. De-activation of **GoldshieldTM 5** can be achieved by the addition of anionic surfactant (such as soap, sulfonates, sulfates) in quantity equivalent to that of **GoldshieldTM 5**.

<u>Homeowner use:</u> This pesticide is toxic to fish. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of pesticide.

DIRECTIONS FOR USE Approved commercial and Industrial Applications

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Wear protective eyewear (goggles or face shield) and gloves when using this product. Dry treated areas and articles such as clothing before use. Remove children and pets from treated area until completely dry.

Prepare solutions by simply adding **GoldshieldTM** 5 to solvent and stirring. Dilute **GoldshieldTM** 5 by adding 0.2 to 2 fluid ounces of **GoldshieldTM** 5 per cup (3.2 to 32 fluid ounces of **GoldshieldTM** 5 per gallon) of water or other solvents (for example, alcohol

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and ketones) and then applied to organic or inorganic substrates by brushing, dipping, padding, soaking, spraying, fogging or by using foam finishing techniques to give a final treatment of 0.1 to 1.0 percent by weight active ingredient.

Dry substrates at temperatures from ambient to a maximum of 160° C (320° F) to effect complete condensation of silanol groups and to remove water, solvents and/or traces of methanol from hydrolysis. Optimum application and drying conditions, such as time and temperature, should be determined for each application before use. If necessary, reapply **GoldshieldTM 5** every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.

Goldshield™ 5 when used as a concrete additive is added directly during concrete preparation. Use 6 fluid ounces Goldshield™ 5 per cubic feet of concrete. Add to water before addition of concrete. Addition of Goldshield™ 5 reduces deterioration of sewer pipes and manholes by inhibiting microbiologically induced corrosion.

Goldshield™ 5 when used as an additive for paints and coatings is added directly during preparation of the paint or coating. Use 5 pounds of Goldshield™ 5 per 100 pounds of paint or coating (or 1 pound Goldshield™ 5 per 20 pounds paint/coating). The addition of the antimicrobial agent Goldshield™ 5 to paints at the point of manufacture preserves the paint in the can as well as the dried paint film. Goldshield™ 5 inhibits the growth of odor causing bacteria, bacteria which causes staining and discoloration, fungi (mold and mildew), and algae on the surface of dried films and coatings.

Goldshield^{TM5} when used on textiles or finished textile products such as socks, undergarments, scrubs or sheets can be applied in an exhaustion method of application, in equipment such as paddle dye baths; rotary, jet and/or laundry equipment. The raw textile material or finished product should be laundered as usual, post scoured and neutralized. Alkalinity may prohibit GoldshieldTM 5 from attaching to fabric. PH of fabric should be less than 6.0 to aid exhaustion. We recommend a compatible nonionic detergent with GoldshieldTM 5. Set temperature at 110°- 120°F.

Dilution: Take solution of Goldshield™ 5 in the amount of 3% of the dry weight of the goods to be laundered and/or processed. (100 lbs. of textiles would use 3 lbs. of liquid concentrate or less than ½ gallon). Take the solution and pour it into a separate five gallon pail and mix with four gallons of warm water (80°-90° F) for ten minutes (10) to assure proper dispersion. The dilution will result in less than 1.0% of active ingredient. Acetic Acid or Citric may be used to adjust pH if necessary.

Inject solution of water and *Goldshield™ 5* into paddle, jet or rotary machines. Hold temperature at 110° - 120°F. for fifteen to twenty minutes to provide adequate time for exhaustion. At end of cycle time, drop water. No rinsing or scouring is required Fabric can then be dried according to conventional methods, with general heat settings at 180□-210□ F.

Application of GoldshieldTM 5 can be checked by: Bromophenol Blue indicator-indicates the presence of GoldshieldTM 5 by a blue cast. If no GoldshieldTM 5 is present, no color will form.

Approved commercial and industrial applications

The active ingredient in *GoldshieldTM 5* is effective against odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae as a static agent. *GoldshieldTM 5* can be used as a final bacteriostatic finish on the following items to impart bacteriostatic/fungistatic (mold and mildew) activity.

- Air filters for furnaces, air-conditioners, air purification devices, automobiles, recirculating air handling systems
- Air filters/materials
- Aquarium filter material
- · Bed sheets, blankets, and bedspreads
- Buffer pads (abrasive and polishing)
- · Carpets and draperies
- Cellulose sponges
- Concrete additive for sewer pipes, manholes and concrete sewer structures; not to be used in treatment of storm drains
- Concrete additive for repair and renewal of sewer pipes and manholes and concrete sewer structures; not to be used in treatment of storm drains
- Exterior walls (such as stone, concrete, brick)
- Fiberfill for upholstery, sleeping bags, apparel, where the fiber is cotton, natural down, nylon, polyester, rayon, or wool
- Fiberglass ductboard
- Fire hose fabric
- Humidifier belts
- Mattress pads and ticking
- Mens underwear and outerwear
- Non-woven disposable diapers
- Non-woven polyester
- Outerwear apparel (jackets, sweaters, sweatshirts, coats, raincoats, overcoats, jerseys, ponchos)
- GoldshieldTM 5 can be used in paints and coatings as an in can preservative for protection of paint film and coating film. Types of paints and coatings include: latex indoor/outdoor paints and stains, wood-stains, architectural paints, lacquer and maintenance coatings, films, laminates and finishes including alkyd, urethane, enamel, epoxy, siloxaline, amino resins, textile coatings, extrusion coatings, architectural coatings and overlays, anti-corrosion coatings, fire-resistant coatings, aliphatic coatings, vinyl-ester and polyester coatings, gel coatings, amino resins, resins used as additive mixes for cement, epoxy laminating resins, and blends and copolymers thereof;

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- Polyurethane and cellulose foam for household, industrial, and institutional sponges and mops
- Polyurethane and polyethylene foam, when covered
- Polyurethane foam for packaging and cushioning in non-food contact applications
- Polyurethane foam used as a growth medium for non-food crops and plants
- Pre-moistened towelettes and tissue wipes (these do not impart pesticidal properties)
- Roofing materials defined as shingles, roofing granules, wood shakes, felt, stone and synthetic overcoats
- · Sand bags, tents, tarpaulins, sails, and ropes
- Athletic and casual shoes
- Shoe insoles
- Shower curtains
- Socks comprised of nylon, nylon/orlon, cotton/nylon, linen/Lycra, acrylic/polypropylene/nylon/Lycra, wool/silk/nylon/Lycra and wool/acrylic/nylon/Lycra
- Throw rugs
- Toweling made of 100 percent cotton, 100 percent polyester, and blends of the two fibers
- Toilet tank and seat covers
- Umbrellas
- Upholstery made of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefins, polypropylene, rayon, spandex, vinyl, wool
- · Vacuum cleaner bags and filters
- Vinyl paper-wallpaper for non-food contact surfaces
- Disposable wiping cloths that can be used for multiple purposes such as dusting or washing furniture, cars, walls, windows, floors, appliances, dishes, counter tops; the wiping cloths do not impart pesticide properties
- Women's hosiery
- · Women's intimate apparel

DIRECTIONS FOR USE

Approved commercial applications used in homes, offices, automobiles and institutions e.g., schools, hospitals, daycare centers, churches, correctional facilities

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Wear protective eyewear (goggles or face shield) and gloves when using this product. Dry treated areas and articles such as clothing before use. Remove children and pets from treated area until completely dry. Clean surfaces prior to application.

For Pump Spray Application: Dilute 8 ounces of Goldshield™ 5 per gallon of water (2 oz. per quart; 1oz. per pint). Using pump sprayer, spray entire area 4"- 6"s from the surface making sure the surface is completely covered. Apply and then let stand until dry

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or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test for staining and color-fastness of fabrics and carpets by treating and drying a small, concealed area prior to application. **GoldshieldTM 5** treats approximately 200 square feet per diluted gallon of water. When treating coarser substrates, more **GoldshieldTM 5** may be required due to absorption. A fan may be used to assist in drying carpeting.

For Commercial Spray Application: For commercial application equipment (i.e. carpet/upholstery steamers, rotary jet extraction cleaners, pressure sprayers) dilute 8 ounces of Goldshield™ 5 per gallon of water (2 oz. per quart; 1oz. per pint); mix well. Apply and then let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test for staining and color-fastness of fabrics and carpets by treating and drying a small, concealed area prior to application. Goldshield™ 5 treats approximately 200 square feet per diluted gallon of water. When treating coarser substrates, more Goldshield™ 5 may be required due to absorption. Dry carpet areas and surfaces before re-entry and dry articles before use. A fan may be used to assist in drying carpeting.

For Dipping/Soaking Application: Use appropriate sized wash basin or tub for dipping/soaking the item you are treating. Use enough Goldshield™ 5 solution to completely submerge item. Dilute 8 ounces of Goldshield™ 5 per gallon of water (2 oz. per quart; 1oz. per pint); mix well. Completely submerge item in solution for 3 minutes. Remove item and dry. Test for staining and color-fastness of fabrics by treating and drying a small, concealed area prior to application. Do not reuse solution after dipping/soaking.

The substrate can be dried at room temperatures or at temperatures to a maximum of 160° C (320° F), for example in a clothes dryer. Remove excess liquid before attempting to dry in a clothes dryer. If necessary, reapply **GoldshieldTM 5** every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.

Goldshield^{TM5} when used on textiles or finished textile products such as socks, undergarments, scrubs or sheets can be applied in an exhaustion method of application, in equipment such as paddle dye baths; rotary, jet and/or laundry equipment. The raw textile material or finished product should be laundered as usual, post scoured and neutralized. Alkalinity may prohibit GoldshieldTM 5 from attaching to fabric. PH of fabric should be less than 6.0 to aid exhaustion. We recommend a compatible nonionic detergent with GoldshieldTM 5. Set temperature at 110°- 120°F.

Dilution: Take solution of GoldshieldTM 5 in the amount of 3% of the dry weight of the goods to be laundered and/or processed. (100 lbs. of textiles would use 3 lbs. of liquid concentrate or less than ½ gallon). Take the solution and pour it into a separate five gallon pail and mix with four gallons of warm water (80°-90° F) for ten minutes (10) to assure proper dispersion. The dilution will result in less than 1.0% of active ingredient. Acetic Acid or Citric may be used to adjust pH if necessary.

Inject solution of water and *Goldshield™ 5* into paddle, jet or rotary machines. Hold temperature at 110° - 120°F. for fifteen to twenty minutes to provide adequate time for exhaustion. At end of cycle time, drop water. No rinsing or scouring is required Fabric can then be dried according to conventional methods, with general heat settings at 180□-210□ F.

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Application of GoldshieldTM 5 can be checked by: Bromophenol Blue indicator-indicates the presence of GoldshieldTM 5 by a blue cast. If no GoldshieldTM 5 is present, no color will form.

Approved commercial applications in homes, offices, automobiles and institutions e.g., schools, hospitals, day care centers, banks, churches, correctional facilities

The active ingredient in *Goldshield™ 5* is effective against odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae as a static agent.

Goldshield™ 5 can be used as a final bacteriostatic finish on the following items to impart bacteriostatic/fungistatic (mold and mildew) activity.

- · Air filters for furnaces, air-conditioners, air purification devices, automobiles, recirculating air handling systems
- Air filters/materials
- Aquarium filter material
- Bed sheets, blankets, and bedspreads
- Buffer pads (abrasive and polishing)
- Carpets and draperies
- Cellulose sponges
- Exterior walls(such as stone, concrete, brick)
- Fiberfill for upholstery, sleeping bags, apparel, where the fiber is cotton, natural down, nylon, polyester, rayon, or wool
- Fiberglass ductboard
- Fire hose fabric
- Humidifier belts
- Mattress pads and ticking
- Mens underwear and outerwear
- Non-woven polyester
- Outerwear apparel (jackets, sweaters, sweatshirts, coats, raincoats, overcoats, jerseys, ponchos)
- Polyurethane and cellulose foam for household, industrial, and institutional sponges and mops
- Polyurethane and polyethylene foam, when covered
- Polyurethane foam for packaging and cushioning in non-food contact applications
- Polyurethane foam used as a growth medium for non-food crops and plants
- Roofing materials defined as shingles, roofing granules, wood shakes, felt, stone and synthetic overcoats
- Sand bags, tents, tarpaulins, sails, and ropes
- Athletic and casual shoes
- Shoe insoles
- Shower curtains
- Socks comprised of nylon, nylon/orlon, cotton/nylon, linen/Lycra, acrylic/polypropylene/nylon/Lycra, wool/silk/nylon/Lycra and wool/acrylic/nylon/Lycra

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- Throw rugs
- Toweling made of 100 percent cotton, 100 percent polyester, and blends of the two fibers
- Toilet tank and seat covers
- Umbrellas
- Upholstery made of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefins, polypropylene, rayon, spandex, vinyl, wool
- Vacuum cleaner bags and filters
- Vinyl paper-wallpaper for non-food contact surfaces
- Disposable wiping cloths that can be used for multiple purposes such as dusting or washing furniture, cars, walls, windows, floors, appliances, dishes, counter tops; the wiping cloths do not impart pesticide properties
- Women's hosiery
- Women's intimate apparel

DIRECTIONS FOR USE For homeowner applications

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Wear protective eyewear (goggles or face shield) and gloves when using this product. Dry treated areas and articles such as clothing before use. Remove children and pets from treated area until completely dry. Clean surfaces prior to application.

Approved homeowner uses

The active ingredient in Goldshield™ 5 is effective against odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae as a static agent. **GoldshieldTM** 5 can be used as a final bacteriostatic finish on the following items to impart bacteriostatic/fungistatic (mold and mildew) activity

	Pest controlled	Dilution Rate	Method of Application
Bed-sheets, blankets, bedspreads, curtains, draperies (washable only), underwear, socks, intimate apparel, hosiery, throw rugs, toweling, toilet tank covers, shower curtains, shoe insoles, outerwear apparel (jackets, sweaters, sweatshirts, coats, raincoats, overcoats, jerseys, ponchos). <i>Goldshield™ 5</i> can be applied to fabrics made of acetates, acrylics, cotton, fiberglass, linen, Lycra, nylon, orlon, polyester, polyethylene, polyolefins, polypropylene, rayon, silk, spandex, vinyl, and wool	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	8 oz./ gallon 2 oz./ quart 1 oz./pint	DIP/SOAK: Dilute Goldshield™ 5 in water; mix well. Use appropriate sized wash basin or tub for dipping/soaking the item you are treating. Use enough Goldshield™ 5 solution to completely submerge item. Keep item in solution for 3 minutes. Remove item and wring excess liquid. Drying may be attained by dripping dry or wringing excess liquid from treated item. For larger items (e.g., bedspreads, curtains, draperies), place in washing machine on spin cycle to aid in the removal of excess liquid. Test staining and color-fastness of fabric and carpets by treating and drying a small concealed area prior to application. Do not reuse solution after dipping/soaking. Dry treated articles before use. Substrates can be hang-dried at room temperature or at temperatures to a maximum of 160 °C (320 °F); (for example in a clothes dryer). If necessary, reapply Goldshield™ 5 every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return. SPRAY: Dilute Goldshield™ 5 in water; mix well. Clean surface prior to application. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4"-6" from the surface making sure the surface is completely covered.

	Pest	Dilution	Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test staining and color-fastness of fabric by treating and drying a small concealed area prior to application. If necessary, reapply <i>GoldshieldTM</i> 5 every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return. Method of Application
	controlled	Rate	mountain of principles.
Air filters and air filter material for Furnaces, air conditioners Air purification systems Automobiles Recirculating air handling systems Vacuum cleaner filters Aquariums	Odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae	8 oz./ gallon 2 oz./ quart 1 oz./pint	SPRAY: Dilute Goldshield 5 in water; mix well. When treating filters, remove filter from the unit. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4"- 6" from the surface making sure the surface is completely covered. Apply and then let stand until dry. If necessary, reapply Goldshield 5 every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.
	Pest controlled	Dilution Rate	Method of Application
Carpeting	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	8 oz./ gallon 2 oz./ quart 1 oz./pint	SPRAY: Dilute <i>Goldshield™</i> 5 in water; mix well. Apply to clean carpet surface. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4"- 6" from the surface making sure the surface is completely covered. For rotary jet extraction cleaners and carpet steamers, add the diluted <i>Goldshield™</i> 5 solution directly to the cleaning tank, then operate the equipment in accordance with manufacturer's instructions. Apply and then let stand until dry. Test staining and color-fastness of carpets by treating and drying a small concealed area prior to application. <i>Goldshield™</i> 5 treats approximately 200 square feet per diluted gallon of water. When treating coarser substrates (e.g., wool carpeting), more <i>Goldshield™</i> 5 may be required due to absorption. Dry carpet areas and surfaces before re-entry. A fan may be used to assist in drying carpeting. Remove children and pets from treated area until completely dried. If necessary, reapply <i>Goldshield™</i> 5 every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.

	Pest controlled	Dilution Rate	Method of Application
Mattress pad and mattress ticking and upholstery composed of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefins, polypropylene, rayon, spandex, vinyl, wool; fiberfill to be used in upholstery, sleeping bags, apparel, where the fiber is cotton, natural down, nylon, rayon or wool	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	8 oz./ gallon 2 oz./ quart 1 oz./pint	SPRAY: Dilute Goldshield™ 5 in water; mix well. Clean surfaces prior to application. Using a trigger pump sprayer spray the entire surface area 4"- 6" from the surface making sure the surface is completely covered. Apply and then let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test staining and color-fastness of fabric by treating and drying a small concealed area prior to application. When applying to mattress pads and ticking do not soak. Remove children and pets from treated area until completely dried. If necessary, reapply Goldshield™ 5 every three months or when odor, staining and discoloration due to bacteria, mold stains and mildew stains return.
	Pest controlled	Dilution Rate	Method of Application
Tents, tarpaulins, sails, ropes.	Odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae	8 oz./ gallon 2 oz./ quart 1 oz./pint	SPRAY: Dilute <i>GoldshieldTM</i> 5 in water; mix well. Clean surface prior to application. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4"-6" from the surface making sure the surface is completely covered. Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test staining and color-fastness of fabric by treating and drying a small concealed area prior to application. If necessary, reapply <i>GoldshieldTM</i> 5 every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return. DIP/SOAK: Dilute <i>GoldshieldTM</i> 5 in water and mix well. Use appropriate sized wash basin or tub for dipping/soaking the item you are treating. Use enough <i>GoldshieldTM</i> 5

			solution to completely submerge item. Keep item in solution for three minutes. Remove item and wring excess liquid. Test staining and color-fastness of fabric by treating and drying a small concealed area prior to application. Do not reuse solution after dipping/soaking. Dry treated articles before use. Substrates can be hang-dried at room temperature or at temperatures to a maximum of 160 °C (320 °F); (for example in a clothes dryer). Remove excess liquid before attempting to dry in a clothes dryer. If necessary, reapply <i>Goldshield™ 5</i> every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.
	Pest controlled	Dilution Rate	Method of Application
Roofing materials (such as shingles, roofing granules, wood shakes, felt, stone, synthetic overcoats) Exterior walls (such as stone, concrete, brick)	Odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae	8 oz./ gallon 2 oz./ quart 1 oz./pint	SPRAY: Dilute Goldshield TM 5 in water; mix well. Make sure the roof or wall is clean prior to application. Using a pressure sprayer, spray the entire surface area 6"-12" from the surface making sure the surface is completely covered. After applying the dilute solution of Goldshield TM 5 let stand until dry. Goldshield TM 5 treats approximately 200 square feet of roofing or wall per diluted gallon of water. If necessary, reapply Goldshield TM 5 every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.
	Pest controlled	Dilution Rate	Method of Application
Buffer pads (polishing and abrasive), Polyurethane and cellulose foam for household sponges and mops, vacuum cleaner bags, umbrellas, casual shoes, athletic shoes	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	8 oz./ gallon 2 oz./ quart 1 oz./pint	SPRAY: Dilute <i>GoldshieldTM 5</i> in water; mix well. Clean surface prior to application. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4"-6" from the surface making sure the surface is completely covered. Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. If necessary, reapply <i>GoldshieldTM 5</i> every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.
	Pest controlled	Dilution Rate	Method of Application
Tubs, glazed tiles, vanity tops, shower	Odor causing	8 oz./ gallon	SPRAY: Dilute Goldshield™ 5 in water; mix well. Using a

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curtains, shower stalls (areas), sinks, washable walls, wall paper for non-food contact, floors, window sills, cabinets, garbage cans, appliances, refrigerators (exterior), fiberglass, formica, glazed tiles, glazed porcelain, synthetic marble, plastic, vinyl	bacteria which cause staining and discoloration, and fungi (mold	2 oz./ quart 1 oz./pint	trigger pump sprayer, spray the entire surface area 4"- 6" from the surface making sure the surface is completely covered. Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. If necessary, reapply <i>Goldshield</i> 5 every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.
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MOLD, MILDEW, ODOR PROTECTOR AND INHIBITOR *Goldshield™ 5* is an antimicrobial agent effective against odor causing bacteria.

Goldshield™ 5 is an antimicrobial agent effective against bacteria which cause staining and discoloration.

Goldshield™ 5 is an antimicrobial agent effective against fungi (mold and mildew).

Goldshield™ 5 is an antimicrobial agent effective against algae.

Goldshield™ 5 an antimicrobial agent, controls the source of odors on surfaces in the home, in the bathroom, in the kitchen.

Bacteriostatic, fungistatic (mold and mildew), algaestatic.

Goldshield™ 5 an antimicrobial agent, inhibits smelly odors caused by mold and mildew that can grow even in the cleanest of homes.

Goldshield™ 5 an antimicrobial agent, inhibits the growth of odor causing bacteria.

Effective on hard non-porous washable bathroom and kitchen surfaces and fixtures around the home.

Effective on modern hard non-porous washable surfaces made of fiberglass, glazed porcelain, Formica®, stainless steel, synthetic marble.

Imparts microbiostatic properties.

Use on carpet and upholstery to inhibit odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew).

Unscented.

Use on carpet and upholstery to inhibit the growth of odor causing bacteria.

Use on carpet and upholstery to inhibit the growth of bacteria which cause staining and discoloration.

Use on carpet and upholstery to inhibit the growth of fungi (mold and mildew).

Use on carpet and upholstery to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae.

Provides an invisible microbiostatic coating to inhibit the growth of odor causing bacteria.

Provides an invisible microbiostatic coating to inhibit the growth of bacteria which cause staining and discoloration.

Provides an invisible microbiostatic coating to inhibit the growth of fungi (mold and mildew).

Provides an invisible microbiostatic coating to inhibit the growth of algae.

Provides an invisible microbiostatic coating to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae.

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Prevents deterioration caused by bacteria and fungi (mold and mildew).

Inhibits deterioration caused by bacteria.

Resists development of microbial odors.

Resists development of stains and discoloration due to bacteria.

Resists development of stains due to fungi (mold and mildew).

Resists stains due to algae.

Resists development of microbial odors, stains and discoloration due to bacteria, fungi (mold and mildew), and algae.

Provides/creates an invisible barrier to inhibit the growth of odor causing bacteria.

Provides/creates an invisible barrier to inhibit the growth of bacteria which cause staining and discoloration.

Provides/creates an invisible barrier to inhibit the growth of fungi (mold and mildew).

Provides/creates an invisible barrier to inhibit the growth of algae.

Provides/creates an invisible barrier to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae.

Provides/creates an invisible barrier to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

Pesticide Storage: Store in original, tightly closed containers below 30°C (86°F) and above 0°C (32°F) in a secure area inaccessible to children and away from food or feed.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. **[For homeowner use the statement will read:** "Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site."]

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke. **[For homeowner use statement will read:** "Container Disposal: Securely wrap original container in several layers of newspaper and discard in trash."]

Note: Any claims for paint use must be for the preservative of the paint in the can. **GoldshieldTM 5** is to be used as an in can preservative for paints to control the growth of odor causing bacteria, bacteria which causes staining and discoloration, fungi (mold and mildew) and algae.

FOR MORE INFORMATION CONCERNING THIS PRODUCT, PLEASE CONSULT THE MATERIAL SAFETY DATA SHEET (MSDS). THE MSDS CAN BE OBTAINED BY WRITING: NBS Technology, LLC PO Box 428, 157 Skunks Misery Rd, Locust Valley, NY 11560 or emailing: enbst@optonline.net

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IMPORTANT: WARRANTY AND DISCLAIMER INFORMATION

NBS Technology, LLC warrants that the product conforms to its chemical description and is reasonably fit for the purposes stated in this bulletin when used in accordance with directions under normal conditions of use; but this warranty of fitness for a particular purpose does not extend to the use of this product contrary to bulletin instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to the seller, and buyer assumes the risk of any such use.

NBS Technology, LLC SPECIFICALLY DISCLAIMS ANY OTHER EXPRESS OR IMPLIED WARRANTY, INCLUDING THE WARRANTY OF MERCHANTABILITY



thigginsnbst@optonline.net 01/09/2008 08:29 AM

To Tracy Lantz/DC/USEPA/US@EPA

cc Velma Noble/DC/USEPA/US@EPA

bcc

Subject Re: More questions 83075-1 amendment

I am traveling and lost access last night. Here is my response. : the pH is testing the water not Goldshield as the pH on it is 5-5.5. The lower the pH the greater affinity the active has in attaching to the fibers. To improve the exhaust onto the material we recommend to bring the pH of the water to below 6.

---- Original Message -----

From: Lantz.Tracy@epamail.epa.gov Date: Monday, January 7, 2008 5:02 pm Subject: More questions 83075-1 amendment

To: Tom Higgins

> Subject

Cc: Noble.Velma@epamail.epa.gov

> > Your label also states: "Acetic acid or Citric may be used to > adjut pH > if necessary." The pH of what? The diluted Goldshield? If so, what > should the pH be adjusted to? Less than 6? > Provide a revised statement which gives complete information regarding > this pH adjustment. > ----- Forwarded by Tracy Lantz/DC/USEPA/US on 01/07/2008 05:59 > PM -----> > > Tracy > Lantz/DC/USEPA/U > S > To > Tom Higgins > 01/07/2008 05:55 > PM> cc>



thigginsnbst@optonline.net 01/08/2008 12:08 PM To Tracy Lantz/DC/USEPA/US@EPA

cc MDVDT@alo.com

bcc

Subject Re: 83075-1 amendment

Please see below

---- Original Message ----

From: Lantz.Tracy@epamail.epa.gov Date: Monday, January 7, 2008 4:55 pm

Subject: 83075-1 amendment

To: Tom Higgins

> Your revised label for this product indicates that "Application of

> Goldshield 5 can be checked by: Bromophenol Blue indicator-indicates

> the presence of Goldshield 5 by a blue cast. If no Goldshield 5 is

> present, no color will form."

>

> Under what conditions should this test be run?

**After drying as the active has to be set.

Are there situations

> when the treated fabric will not show the presence of Goldshield 5?

**Yes. This can be caused by the improper percentage of add-on; i.e. less than 1%. Or if the launderer didn't permit the Goldshield to disperse in water long enough. Additionally, if the detergent had an abundance of hypochlorite bleach [over 20%] in the scouring process it could impede the active from adhereing in certain spots. The post scour has to be done correctly to eliminate the bleach, and any trace amounts, not only to avoid the blocking of Goldshield, but more imptantly u don't want these trace amounts of organics [of bleach] on textiles.

> If the test comes up negative (no Goldshield) what action should be

> taken by the user?

**a) They should check the percentage of add-on to be sure they mixed the proper percentage as recommended to the dry weith of textiles being treated.

b) They should double check their alkalinity and pH, as described in our instructions

c) They should insure the proper post scour was done correctly (this is generally a timing issue)

d) Failing those checks, they can call our 800 number which we place on our label and discuss it with our laundering/textile expert.

Is there a parameter which should then be changed

> in the treatment of the fabric?

c) No other than what we advise on our labels/specification protocols.

Healing section of Goldshields

Application to fabric ...

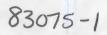
how much

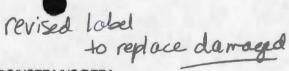
how to apply does this ruinfle

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con batch

be retreate







MDVDT@aol.com 10/26/2007 10:20 AM To Tracy Lantz/DC/USEPA/US@EPA

cc thigginsnbst@optonline.net

DCC

Subject Amended Label

Dear Ms. Lantz:

I'm attaching a copy of the amended label you requested from Tom who is travelling. I've highlighted his changes in Red on the attachment. If you need any further information please contact me. Very Truly Yours, Ted Shlisky



See what's new at AOL.com and Make AOL Your Homepage. MasterLabel05final091405Amendment.1017.07mod.doc



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

October 23, 2007

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

TED SHLISKY
NBS TECHNOLOGY, LLC
157 SKUNKS MISERY ROAD, PO Box 428
LOCUST VALLEY, NY 11560-

PRODUCT NAME: GOLD SHIELD 5

COMPANY NAME: NBS TECHNOLOGY, LLC

EPA FILE SYMBOL: 83075-1 EPA RECEIPT DATE: 10/19/07

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Antimicrobials Division, Risk Management Team 31, at (703) 308-6233.

Sincerely, Aurice
Front End Processing Staff

Information Services Branch

Information Technology & Resources Management Division



NBS Technology, LLC

157 Skunks Misery Rd. P.O.Box 428 Locust Valley, New York 11560 thigginsnbst@optonline.net

516.674.4085P

516.759.5309 F

need 3 copies
(1 copy we into)

Date: 10/15/07

Ms. Velma Noble, Antimicrobial Division **Environmental Protection Agency** 1 Potomac Yd, South Bldg 2777 South Crystal Dr., Room 8620 Arlington, Va. 22202

Re: Amendment to Master Label #83075-1

Dear Ms. Noble,

I believe clarity in labeling is a consistent theme of the EPA, and to that end I have clarified the instructions so that a textile producer, a textile finished product manufacturer, or applicator, will have clear and concise instructions for proper applications. It is, if you will, modernizing the process for the commercial equipment used in these environments.

I had spent 25 years in my own textile company and prior to that was an executive at JC Penney, so utilizing that experience. I have taken the rudimentary instructions that are on the label and converted them to apply to modern equipment. In reality the process hasn't changed, the equipment has and to communicate clearly with the textile/laundry industry we need to speak their language.

Enclosed you will find the EPA form and Master label changes. I have highlighted those in blue for easy

review. I thank you in advance.

Sincerely

Chief Operating Officer

Cc: Tom Higgins Joe Gaino





⊕EPA	Environmenta	United States Il Protection ington, DC 204		E	Registration Amendment Other		OPP Identifier Number	
		Application	on for Pestic	ide - Section	n I			
1. Company/Product Number	or .		2. EPA Velma	Product Menager	1	3. Pre	oposed Classification	
83075 4. Company/Product (Name	4		PM#	Noble		- x	None Restricted	
Goldshield 5			31					
5. Name and Address of Ap NbS Technology, LLC PO Box 428 157 Skunk Misery Rd.			(b)(i), i to: EPA		imilar or identic		FIFRA Section 3(c)(3) mposition and labeling	
			Section -					
Resubmission in responsible Notification - Explain Explanation: Use addition Clarification of Proceedings	ponse to Agency letter i below. inal pegels) if necesser	ry. (For section		Agency letter d "Me Too" Appli Other - Explain	ication.			
Material This Product Wi Child-Resistant Packaging Yes	Il Be Peckaged In: Unit Packaging Yes		Section -		2. Type of C	ontainer Metal		
Certification must be submitted	No If "Yes" Unit Packaging wgt.	No. per container	No If "Yes" Peckage wgt	No. per container	Plastic Glass Paper		Specify)	
3. Location of Net Contents	Information Container	4. Size(s) Ret	tell Container	5.1	Location of Label	Directio	ine .	
6. Menner in Which Label is	Affixed to Product	Lithog Paper Stenci	raph glued	Other _				
			Section - I	V				
1. Contact Point (Complete	items directly below !	for identificatio	n of individual to b	e contected, if no	ocessery, to proc	ees this	application.	
Name Theodore Shlisky			Title COO				4 4085	
I certify that the state I acknowledge that ar both under applicable	ements I have made on my knowlingly false or law.	Certifica n this form and misleading sta	all ettachments th	ereto are true, ac nishable by fine c	curete and comp r imprisonment	25	6. Data Application Regelved (Stamped)	
2. Signature	'54		8. Title	0			••••	
4. Typed Name Theodore Shlisky			5. Date 10/11/0	7			•	

EPA Form 9570-1 (Rev. 3-94) Previous editions are obsolete.

Whits - EPA File Copy (original)





EPA Registration Number of Product

83075-1

Environmental Protection Agency

Office of Pesticide Programs (7505C) Washington, DC 20460

Notice of Supplemental Distribution of a Registered Pesticide Product

Distributor Company Number

Instructions

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

84605

	Note: Do not subm	it distributor product labels					
Name of Registered Product (basic p Goldshield 5	lame of Registered Product (basic product name accepted by EPA) Olistributor Product Name GS 5 or Goldshield 5						
Name and Address of Distributor (Ty	pe; include ZIP code)		••••				
Viking Environmental	Facility: Viking Environmental		*****				
27 Autumn Street	8A Winkler Road		•				
Lodi, NJ 07644	Sidney, NY 13838						
	Read All Conditions	Before Signing	•••••				
			•••				
1. The distributor product mu							
The distributor product mu the registered basic product		ickaged by the same person who	manufactures and package				
		same claims as the basic produc	t. provided, however, that				
		er changes to the label are neces					
1. The product must remain i							
The label must bear the EF company number.	A registration number of the	ne basic product, followed by a h	ryphen and the distributor's				
	must bear the name and ad	dress of the distributor qualified	by such terms as "packed				
		t the name is not that of the mai					
		o distributor products. It is the r					
registrant to see that all dis	stributor labeling is kept in o	compliance with requirements pla	aced on the basic product.				
	Distri	hutor					
We intend to market our product und		pecified above, subject to the conditions	specified on this Notice.				
Signature and Title of Distributor			Date				
~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	CEO		10-9-07				
	CLO		10 1 0 1				
	Regi	strant					
		istrant stributor Product specified above, subject	to the conditions specified on this				
Notice.			to the conditions specified on this				
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Notice.							





#### **Environmental Protection Agency**

Office of Pesticide Programs (7505C)
Washington, DC 20460

## Notice of Supplemental Distribution of a Registered Pesticide Product

#### Instructions

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If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

Note: Do not submit distributor product labels    Note: Do not submit distributor product labels	the concentence and digitatore of both the registratic		
Note: Do not submit distributor product lebels    Image: Registered Product (basic product name accepted by EPA)   Distributor Product Name			V Number
Name and Address of Distributor (Type; include ZIP code)  Facility: Viking Environmental 27 Autumn Street Lodi, NJ 07644  1. The distributor product must have the same composition as the basic product. 2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product. 3. The labeling for the distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product. 3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.  The product must remain in the manufacturer's unbroken container.  The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.  6. Distributor product labels must bear the name and address of the distributor qualified by such terms as "packed for"; of "sold by"; or "sold by" to show that the name is not that of the manufacturer.  7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.  Distributor  Date    Date	030/3-1	64603	
Name and Address of Distributor (Type; include ZIP code)  Facility: Viking Environmental ZY Autumn Street Lodi, NY 07644  1. The distributor product must have the same composition as the basic product. 2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product. 3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.  The product must remain in the manufacturer's unbroken container.  The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.  6. Distributor product labels must bear the name and address of the distributor qualified by such terms as "backed for", "distributed by"; or "sold by" to show that the name is not that of the manufacturer.  7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the Notice.  Distributor  We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.  Registrant  I agree that the histylbutor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.	Note: Do not se	ubmit distributor produ	ct labels
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Viking Environmental 27 Autumn Street Lodi, NJ 07644  Viking Environmental 84 Winkler Road Sidney, NY 13838  Read All Conditions Before Signing  1. The distributor product must have the same composition as the basic product.  2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.  3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be detected if by doing so, no other changes to the label are necessary.  The product must remain in the manufacturer's unbroken container.  The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.  6. Distributor product labels must bear the name and address of the distributor qualified by such terms as packed for", distributed by"; or "sold by" to show that the name is not that of the manufacturer.  7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.  Distributor  Date  10-9-07  Registrant  1 agree that the distributor named shove may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Natice.	Name and Address of Distributor (Type; include ZIP code)		
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The product must remain in the manufacturer's unbroken container.  The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.  6. Distributor product labels must bear the name and address of the distributor qualified by such terms as "packed for", "distributed by"; or "sold by" to show that the name is not that of the manufacturer.  7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.  Distributor  We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.  Registrant  I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.			
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Signature and Title of Distributor  CEO  Registrant  I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.	D	istributor	••••
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I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.	CEO CEO		10-9-09
Notice.		Registrant	
	I agree that the distributor named above may distribute and sell th	ne Distributor Product specifi	ed above, subject to the conditions specified on this
Signature and Title of Registration   Date   10   10   0 7	Notice.		
10/10/07	Signatured shot little of Registrated		Date /
701010	manual /		10/10/07
	1000000		10/10/07

EPA Form 8570-5 (Rev. 8-94) Previous editions are obsolete.

White - EPA



# U.M. FEW HIGHESENTAR OR BATEOUT ROOT ECTION AGENCY

AGENCY

Office of Pesticide Programs Antimicrobials Division (7510P) 1200 Pennsylvania Avenue NW Washington, D.C. 20460

MONIDET.	
83075-	1

Date of Issuance:

JUN 1 6 2006

NOTICE OF PESTICIDE:

x Registration
Reregistration

Conditional

Term of Issuance:

Name of Pesticide Product:

Goldshield5

(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

NBS Technology, LLC P.O. Box 428 157 Skunks Misery Rd. Locust Valley, NY 11560

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec 3(c)(7)(a) provided that you:

- 1. Submit and/or cite all data required for registration of your product under FIFRA sec. 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit acceptable responses required for re-registration of your product under FIFRA section 4.
- 2. Make the labeling change listed below before you release the product for shipment:

Revise the EPA Registration Number to read, "EPA Reg. No. 83075-1".

Signature of Appro		1	Date	9:		
Velma Noble		last for		. da 26	2006	
Product Manager	Team-31					
Regulatory Mana	gement Branch I				In-Lucia III	
Antimicrobials D		CONCURRENCES				
YMBOLA Drm 8570-6						
URNAME		******		**************		
ATE					97	
EPA Form 1320-1A (1/90)		Printed on Recycled Paper			OFFICIA	L FILE CO

#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Page 2 EPA Reg. No. 83075-1

- 3. The Enforcement Analytical Method dated 5/19/06 and received by the Agency on the same day has been found to be acceptable. Since this study has not received an MRID, resubmit this study to the Agency through Front End Processing so that an MRID will be assigned.
- 4. Upon completion, submit a one year Storage Stability and Corrosion Characteristics Study to the Agency for review.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records. Submit one (1) copy of your final printed labeling prior to release of this product for shipment. If you have any questions concerning this letter, please contact Tracy Lantz at (703) 308-6415.

Sincerely,

Velma Noble

**Product Manager 31** 

Tray Lant

Regulatory Branch I

Antimicrobials Division (7510P)

E	Englowery (Stomped L. L. 1) CONCURRENCES							
SYMBOL 7	protosure. (Di	:6/15/06:830						
SURNAME		THE REAL PERSONS CARD						
DATE	7510P	6/16/06			-			
EPA Form	1320-1A (1/90)			Printed on Recycles	d Paper		OFFICE	AL FILE COPY



#### Goldshield5TM

# MICROBIOSTATIC AGENT A Silicone Quaternary Ammonium Salt

ACCEPTED with COMMENTS EPA Letter Dated:



Under the Federal Insecticide, Fungicide and Rodenticide Act as amended for the pesticide, registered under EPA Reg. No.

Active Ingredient: 3-(Trihydroxysilyl)propyldimethyloctadecyl ammonium chloride.

Other Ingredients: 95.0%

TOTAL
INGREDIENTS: 100.0%

#### KEEP OUT OF REACH OF CHILDREN

EPA Reg. No. 000700

# **WARNING**

**EPA EST. xxxxx-NY-xx** 

NET CONTENTS: 2, 4, 8, 16, 20, 22, or 36 fluid oz.; 1, 5, 55, 150, or 275 gal.

Lot No.

### **FIRST AID**

Have the product container or label with you when calling the poison control center or doctor, or going for treatment.

#### IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
- Call poison control center or doctor for treatment advice.

#### IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.
- Call a poison control center or doctor for further treatment advice.

#### IF ON SKIN:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

## **IF SWALLOWED:**

Call a poison control center or doctor immediately for treatment advice.

# PAGE 2 - MASTER LABEL FOR GOLDSHIELD 5™

- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

A microbiostatic agent is an agent that inhibits the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae. This product does not protect users or others against food-borne or disease-causing bacteria.

# PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING. Causes substantial but temporary eye injury. Harmful if absorbed through skin or inhaled. Do not get in eyes. Avoid contact with skin and avoid breathing vapor. Wear protective eyewear (goggles or face shield). Wash thorotopic with soap and water after handling. Remove contaminated clothing and wash before reuse.

#### **ENVIRONMENTAL HAZARDS**

1 6 2006

Commercial and industrial uses: This pesticide is toxic to fish. Do not discharge effluent containing this product intradebiside, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Political Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge of the pasticide arge effluent containing this product to sewer systems without previously notifying the local sewage treatment authority. For guidance, contact your State Water Board or Regional Office of the EPA.

De-activation may be required during clean up if a spill occurs. De-activation of *GOLDSHIELD* 5TMcan be achieved by the addition of anionic surfactant (such as soap, sulfantes) in quantity equivalent to that of *GOLDSHIELD* 5TM.

<u>Homeowner use:</u> This pesticide is toxic to fish. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of pesticide.

# DIRECTIONS FOR USE Approved commercial and Industrial Applications

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Wear protective eyewear (goggles or face shield) and gloves when using this product. Dry treated areas and articles such as clothing before use. Remove children and pets from treated area until completely dry.

Prepare solutions by simply adding *GOLDSHIELD* 5TMto solvent and stirring. Dilute *GOLDSHIELD* 5TMby adding 0.2 to 2 fluid ounces of *GOLDSHIELD* 5TMper cup (3.2 to 32 fluid ounces of *GOLDSHIELD* 5TMper gallon) of water or other solvents (for example, alcohol and ketones) and then applied to organic or inorganic substrates by brushing, dipping, padding, soaking, spraying, fogging or by using foam finishing techniques to give a final treatment of 0.1 to 1.0 percent by weight active ingredient.

### PAGE 3 - MASTER LABEL FOR GOLDSHIELD 5TM

Dry substrates at temperatures from ambient to a maximum of 160° C (320° F) to effect complete condensation of silanol groups and to remove water, solvents and/or traces of methanol from hydrolysis. Optimum application and drying conditions, such as time and temperature, should be determined for each application before use. If necessary, reapply GOLDSHIELD 5TMevery three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.

GOLDSHIELD 5™ when used as a concrete additive is added directly during concrete preparation. Use 6 fluid ounces GOLDSHIELD 5TMper cubic feet of concrete. Add to water before addition of concrete. Addition of GOLDSHIELD 5TM reduces deterioration of sewer pipes and manholes by inhibiting microbiologically induced corrosion.

GOLDSHIELD 5TMwhen used as an additive for paints and coatings is added directly during preparation of the paint or coating. Use 5 pounds of GOLDSHIELD 5TMper 100 pounds of paint or coating (or 1 pound GOLDSHIELD 5TMper 20 pounds paint/coating). The addition of the antimicrobial agent GOLDSHIELD 5TM) to paints at the point of manufacture preserves the paint in the can as well as the dried paint film. GOLDSHIELD 5TMnhabits the growth of odor causing bacteria, bacteria which causes ACCEPTED staining and discoloration, fungi (mold and mildew), and algae on the surface of dried films and coatings. with COMMENTS

**EPA Letter Dated:** 

# Approved commercial and industrial applications

TITN 1 6 2006

Under the Federal Insecticide, The active ingredient in GOLDSHIELD 5TMs effective against odor causing bacteria, bacteria which cause statisticale, discoloration, fungi (mold and mildew) and algae as a static agent. GOLDSHIELD 5TM can be used as set in the static agent. GOLDSHIELD 5TM can be used as set in the static agent. 83075-1

Air filters for furnaces, air-conditioners, air purification devices, automobiles, recirculating air handling systems

the following items to impart bacteriostatic/fungistatic (mold and mildew) activity.

- Air filters/materials
- Aquarium filter material
- Bed sheets, blankets, and bedspreads
- Buffer pads (abrasive and polishing)
- Carpets and draperies
- Cellulose sponges
- Concrete additive for sewer pipes, manholes and concrete sewer structures; not to be used in treatment of storm drains
- Concrete additive for repair and renewal of sewer pipes and manholes and concrete sewer structures; not to be used in treatment of storm drains
- Exterior walls (such as stone, concrete, brick)
- Fiberfill for upholstery, sleeping bags, apparel, where the fiber is cotton, natural down, nylon, polyester, rayon, or wool
- Fiberglass ductboard

#### PAGE 4 - MASTER LABEL FOR GOLDSHIELD 5TM

- Fire hose fabric
- Humidifier belts
- · Mattress pads and ticking
- Mens underwear and outerwear
- Non-woven disposable diapers
- Non-woven polyester
- Outerwear apparel (jackets, sweaters, sweatshirts, coats, raincoats, overcoats, jerseys, ponchos)
- GOLDSHIELD 5[™] can be used in paints and coatings as an in can preservative for protection of paint film and coating film. Types of paints and coatings include: latex indoor/outdoor paints and stains, wood-stains, architectural paints, lacquer and maintenance coatings, films, laminates and finishes including alkyd, urethane, enamel, epoxy, siloxaline, amino resins, textile coatings, extrusion coatings, architectural coatings and overlays, anti-corrosion coatings, fire-resistant coatings, aliphatic coatings, vinyl-ester and polyester coatings, gel coatings, amino resins, resins used as additive mixes for cement, epoxy laminating resins, and blends and copolymers thereof;
- Polyurethane and cellulose foam for household, industrial, and institutional sponges and mops
- Polyurethane and polyethylene foam, when covered
- Polyurethane foam for packaging and cushioning in non-food contact applications
- Polyurethane foam used as a growth medium for non-food crops and plants
- Pre-moistened towelettes and tissue wipes (these do not impart pesticidal properties)
- Roofing materials defined as shingles, roofing granules, wood shakes, felt, stone and synthetic overcoats
- Sand bags, tents, tarpaulins, sails, and ropes
- Athletic and casual shoes
- Shoe insoles
- Shower curtains
- Socks comprised of nylon, nylon/orlon, cotton/nylon, linen/Lycra, acrylic/polypropylene/nylon/Lycra, wool/silk/nylon/Lycra and wool/acrylic/nylon/Lycra
- Throw rugs
- Toweling made of 100 percent cotton, 100 percent polyester, and blends of the two fibers
- Toilet tank and seat covers
- Umbrellas
- Upholstery made of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefins, polypropylene, rayon, spandex, vinyl, wool
- Vacuum cleaner bags and filters
- Vinyl paper-wallpaper for non-food contact surfaces
- Disposable wiping cloths that can be used for multiple purposes such as dusting or washing furniture, cars, walls, windows, floors, appliances, dishes, counter tops; the wiping cloths do not impart pesticide properties
- Women's hosiery
- Women's intimate apparel

ACCEPTED
with COMMENTS
EPA Letter Dated:

nder the Federal Insecticide, ungicide and Rodenticide Act as amended for the pesticide, registered under EPA Reg. No.





#### DIRECTIONS FOR USE

he Taderal Insecticide. Approved commercial applications used in homes, offices, automobiles and institutions redenticide Act as e.g., schools, hospitals, daycare centers, churches, correctional facilities and under EPA Reg. No.

83075-1

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Wear protective eyewear (goggles or face shield) and gloves when using this product. Dry treated areas and articles such as clothing before use. Remove children and pets from treated area until completely dry. Clean surfaces prior to application.

For Pump Spray Application: Dilute 8 ounces of GOLDSHIELD 5TMper gallon of water (2 oz. per quart; 1oz. per pint). Using pump sprayer, spray entire area 4"- 6"s from the surface making sure the surface is completely covered. Apply and then let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test for staining and color-fastness of fabrics and carpets by treating and drying a small, concealed area prior to application. GOLDSHIELD 5TMtreats approximately 200 square feet per diluted gallon of water. When treating coarser substrates, more GOLDSHIELD 5TMT may be required due to absorption. A fan may be used to assist in drying carpeting.

For Commercial Spray Application: For commercial application equipment (i.e. carpet/upholstery steamers, rotary jet extraction cleaners, pressure sprayers) dilute 8 ounces of GOLDSHIELD 5TM per gallon of water (2 oz. per quart; 1oz. per pint); mix well. Apply and then let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test for staining and color-fastness of fabrics and carpets by treating and drying a small, concealed area prior to application. GOLDSHIELD 5™ treats approximately 200 square feet per diluted gallon of water. When treating coarser substrates, more GOLDSHIELD 5™ may be required due to absorption. Dry carpet areas and surfaces before re-entry and dry articles before use. A fan may be used to assist in drying carpeting.

For Dipping/Soaking Application: Use appropriate sized wash basin or tub for dipping/soaking the item you are treating. Use enough GOLDSHIELD 5™ solution to completely submerge item. Dilute 8 ounces of GOLDSHIELD 5™ per gallon of water (2 oz. per quart; 1oz. per pint); mix well. Completely submerge item in solution for 3 minutes. Remove item and dry. Test for staining and color-fastness of fabrics by treating and drying a small, concealed area prior to application. Do not reuse solution after dipping/soaking.

The substrate can be dried at room temperatures or at temperatures to a maximum of 160° C (320° F), for example in a clothes dryer. Remove excess liquid before attempting to dry in a clothes dryer. If necessary, reapply GOLDSHIELD 5TM every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.

#### PAGE 6 - MASTER LABEL FOR GOLDSHIELD 5TM

# Approved commercial applications in homes, offices, automobiles and institutions e.g., schools, hospitals, day care centers, banks, churches, correctional facilities

The active ingredient in *GOLDSHIELD* 5[™] is effective against odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae as a static agent.

GOLDSHIELD 5TMcan be used as a final bacteriostatic finish on the following items to impart bacteriostatic/fungistatic (mold and mildew) activity.

- · Air filters for furnaces, air-conditioners, air purification devices, automobiles, recirculating air handling systems
- Air filters/materials
- Aguarium filter material
- Bed sheets, blankets, and bedspreads
- Buffer pads (abrasive and polishing)
- Carpets and draperies
- Cellulose sponges
- Exterior walls(such as stone, concrete, brick)
- Fiberfill for upholstery, sleeping bags, apparel, where the fiber is cotton, natural down, nylon, polyester, rayon, or wool
- Fiberglass ductboard
- Fire hose fabric
- Humidifier belts
- Mattress pads and ticking
- Mens underwear and outerwear
- Non-woven polyester
- Outerwear apparel (jackets, sweaters, sweatshirts, coats, raincoats, overcoats, jerseys, ponchos)
- Polyurethane and cellulose foam for household, industrial, and institutional sponges and mops
- Polyurethane and polyethylene foam, when covered
- Polyurethane foam for packaging and cushioning in non-food contact applications
- Polyurethane foam used as a growth medium for non-food crops and plants
- Roofing materials defined as shingles, roofing granules, wood shakes, felt, stone and synthetic overcoats
- Sand bags, tents, tarpaulins, sails, and ropes
- Athletic and casual shoes
- Shoe insoles
- Shower curtains
- Socks comprised of nylon, nylon/orlon, cotton/nylon, linen/Lycra, acrylic/polypropylene/nylon/Lycra, wool/silk/nylon/Lycra and wool/acrylic/nylon/Lycra
- Throw rugs
- Toweling made of 100 percent cotton, 100 percent polyester, and blends of the two fibers
- Toilet tank and seat covers
- Umbrellas
- Upholstery made of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefins, polypropylene, rayon, spandex, vinyl, wool
- Vacuum cleaner bags and filters
- Vinyl paper-wallpaper for non-food contact surfaces

ACCEPTED
with COMMENTS
EPA Letter Dated:

Jan 16 2006

Under the Federal Insecticide, Aungicide, and Rodenticide Act amended, for the pesticide, registered under EPA Reg. No.

83075-1

# PAGE 7 - MASTER LABEL FOR GOLDSHIELD 5TM

- Disposable wiping cloths that can be used for multiple purposes such as dusting or washing furniture, cars, walls, windows, floors, appliances, dishes, counter tops; the wiping cloths do not impart pesticide properties
- Women's hosiery
- Women's intimate apparel

ACCEPTED with COMMENTS EPA Letter Dated:

16 2006

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended for the pesticide,
registered under EPA Reg. No.

83075-1

# **DIRECTIONS FOR USE** For homeowner applications

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Wear protective eyewear (goggles or face shield) and gloves when using this product. Dry treated areas and articles such as clothing before use. Remove children and pets from treated area until completely dry. Clean surfaces prior to application.

# Approved homeowner uses

The active ingredient in GOLDSHIELD 5™ is effective against odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae as a static agent. GOLDSHIELD 5™ can be used as a final bacteriostatic finish on the following items to impart be triotation funding the static funding t

	Pest controlled	Dilution Rate	Method of Application
Bed-sheets, blankets, bedspreads, curtains, draperies (washable only), underwear, socks, intimate apparel, hosiery, throw rugs, toweling, toilet tank covers, shower curtains, shoe insoles, outerwear apparel (jackets, sweaters, sweatshirts, coats, raincoats, overcoats, jerseys, ponchos). GOLDSHIELD 5 TM can be applied to fabrics made of acetates, acrylics, cotton, fiberglass, linen, Lycra, nylon, orlon, polyester, polyethylene, polyolefins, polypropylene, rayon, silk, spandex, vinyl, and wool	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)  ACCEP with COM EPA Lette Under the Federal Pungicide, and Roamended, for the registered under \$30.75	MENTS er Dated:  Insecticide, denticide Act as pesticide, EPA Reg. No.	DIP/SOAK: Dilute GOLDSHIELD 5 TM in water; mix well. Use appropriate sized wash basin or tub for dipping/soaking the item you are treating. Use enough GOLDSHIELD 5 TM solution to completely submerge item. Keep item in solution for 3 minutes. Remove item and wring excess liquid. Drying may be attained by dripping dry or wringing excess liquid from treated item. For larger items (e.g., bedspreads, curtains, draperies), place in washing machine on spin cycle to aid in the removal of excess liquid. Test staining and color-fastness of fabric and carpets by treating and drying a small concealed area prior to application. Do not reuse solution after dipping/soaking. Dry treated articles before use. Substrates can be hang-dried at room temperature or at temperatures to a maximum of 160 °C (320 °F); (for example in a clothes dryer). If necessary, reapply GOLDSHIELD 5 TM every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.  SPRAY: Dilute GOLDSHIELD 5 TM in water; mix well. Clean surface prior to application. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4"-6" from the surface making sure the surface is completely covered. Let stand until dry or let stand 3 minutes and wipe dry with

		<u>,</u>	
			cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test staining and color-fastness of fabric by treating and drying a small concealed area prior to application. If necessary, reapply <i>GOLDSHIELD</i> 5 TM every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.
	Pest	Dilution	Method of Application
file the second of the second	controlled	Rate	
Air filters and air filter material for	Odor causing	8 oz./ gallon	<b>SPRAY:</b> Dilute <i>GOLDSHIELD</i> 5 TM in water; mix well.
<ul> <li>Furnaces, air conditioners</li> </ul>	bacteria,	2 oz./ quart	When treating filters, remove filter from the unit. Using a
Air purification systems	bacteria	1 oz./pint	trigger pump sprayer or pressure sprayer, spray the entire
Automobiles	which cause		surface area 4"- 6" from the surface making sure the surface
Recirculating air handling systems	staining and		is completely covered. Apply and then let stand until dry. If
Vacuum cleaner filters	discoloration,		necessary, reapply GOLDSHIELD 5 TM every three months
Aquariums	fungi (mold		or when odor, staining and discoloration due to bacteria,
- Adamano	and mildew),		mold stains, mildew stains, and algae stains return.
	and algae		
	Pest	Dilution	Method of Application
	controlled	Rate	
Carpeting	Odor causing	8 oz./ gallon	SPRAY: Dilute GOLDSHIELD 5™ in water; mix well. Apply
	bacteria,	2 oz./ quart	to clean carpet surface. Using a trigger pump sprayer or
	bacteria	1 oz./pint	pressure sprayer, spray the entire surface area 4"- 6" from
	which cause		the surface making sure the surface is completely covered.
	staining and		For rotary jet extraction cleaners and carpet steamers, add
	discoloration,		the diluted GOLDSHTELD 5 TM solution directly to the
	and		cleaning tank, then operate the equipment in accordance
	fungi (mold		with manufacturer's instructions. Apply and then let stand
	and mildew)		until dry. Test staining and color-fastness of carpets by
	ACCEP	TED	treating and drying a small concealed area prior to
	with COM	MENTS	application. GOLDSHIELD 5 TM treats approximately 200
	EPA Lette	r Dated:	square feet per diluted gallon of water. When treating
	16		coarser substrates (e.g., wool carpeting), more GOLDSHIELD 5 TM may be required due to absorption. Dry
	Under the Federal Fungicide, and Ro amended, for the registered under	pesticide, EPA Reg. No.	carpet areas and surfaces before re-entry. A fan may be used to assist in drying carpeting. Remove children and pets from treated area until completely dried. If necessary, reapply <i>GOLDSHIELD</i> 5 TM every three months or when odor, staining and discoloration due to bacteria, mold stains,

			and mildew stains return.
	Pest controlled	Dilution Rate	Method of Application
Mattress pad and mattress ticking and upholstery composed of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefins, polypropylene, rayon, spandex, vinyl, wool; fiberfill to be used in upholstery, sleeping bags, apparel, where the fiber is cotton, natural down, nylon, rayon or wool	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	8 oz./ gallon 2 oz./ quart 1 oz./pint	SPRAY: Dilute GOLDSHIELD 5 TM in water; mix well. Clean surfaces prior to application. Using a trigger pump sprayer spray the entire surface area 4"- 6" from the surface making sure the surface is completely covered. Apply and then let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test staining and color-fastness of fabric by treating and drying a small concealed area prior to application. When applying to mattress pads and ticking do not soak. Remove children and pets from treated area until completely dried. If necessary, reapply GOLDSHIELD 5 TM every three months or when odor, staining and discoloration due to bacteria, mold stains and mildew stains return.
	Pest controlled	Dilution Rate	Method of Application
Tents, tarpaulins, sails, ropes.	Odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae	8 oz./ gallon 2 oz./ quart 1 oz./pint	SPRAY: Dilute GOLDSHIELD 5 TM in water; mix well. Clean surface prior to application. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4"-6" from the surface making sure the surface is completely covered. Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test staining and color-fastness of fabric by treating and drying a small concealed area prior to application. If necessary, reapply GOLDSHIELD 5 TM every
	ACCEPTED with COMMENTS EPA Letter Dated:		three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return. <b>DIP/SOAK:</b> Dilute <i>GOLDSHIELD</i> 5 TM in water and mix
	Under the Fede	ral Insecticid <b>e</b> ,	well. Use appropriate sized wash basin or tub for dipping/soaking the item you are treating. Use enough GOLDSHIELD 5 TM solution to completely submerge item.
	Fungicide, and Rodenticide Act as amended. for the pesticide, registered under EPA Reg. No. 83075-		108

PAGE 11 - MASTER LABEL FOR GOLDSHIELD 5

		MMENTS tter Dated:  Insecticide, denticide Act as esticide, PA Reg. No.	Keep item in solution for three minutes. Remove item and wring excess liquid. Test staining and color-fastness of fabric by treating and drying a small concealed area prior to application. Do not reuse solution after dipping/soaking. Dry treated articles before use. Substrates can be hang-dried at room temperature or at temperatures to a maximum of 160 °C (320 °F); (for example in a clothes dryer). Remove excess liquid before attempting to dry in a clothes dryer. If necessary, reapply <i>GOLDSHIELD</i> 5 TM every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.
	Pest controlled	Dilution Rate	Method of Application
Roofing materials (such as shingles, roofing granules, wood shakes, felt, stone, synthetic overcoats) Exterior walls (such as stone, concrete, brick)	Odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae	8 oz./ gallon 2 oz./ quart 1 oz./pint	SPRAY: Dilute GOLDSHIELD 5 TM in water; mix well. Make sure the roof or wall is clean prior to application. Using a pressure sprayer, spray the entire surface area 6"-12" from the surface making sure the surface is completely covered. After applying the dilute solution of GOLDSHIELD 5 TM et stand until dry. GOLDSHIELD 5 TM treats approximately 200 square feet of roofing or wall per diluted gallon of water. If necessary, reapply GOLDSHIELD 5 TM every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.
ar Virib	Pest controlled	Dilution Rate	Method of Application
Buffer pads (polishing and abrasive), Polyurethane and cellulose foam for household sponges and mops, vacuum cleaner bags, umbrellas, casual shoes, athletic shoes	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	8 oz./ gallon 2 oz./ quart 1 oz./pint	SPRAY: Dilute GOLDSHIELD 5 TM In water; mix well. Clean surface prior to application. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4"-6" from the surface making sure the surface is completely covered. Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. If necessary, reapply GOLDSHIELD 5 TM every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.
	Pest controlled	Dilution Rate	Method of Application
Tubs, glazed tiles, vanity tops, shower curtains, shower stalls (areas), sinks,	Odor causing bacteria,	8 oz./ gallon 2 oz./ quart	SPRAY: Dilute GOLDSHIELD 5 TM in water; mix well. Using a trigger pump sprayer, spray the entire surface area 4"- 6"

### PAGE 12 - MASTER LABEL FOR GOLDSHIELD 5TM

washable walls, wall paper for non-food	bacteria	1 oz./pint	from the surface making sure the surface is completely
contact, floors, window sills, cabinets,	which cause		covered. Let stand until dry or let stand 3 minutes and wipe
garbage cans, appliances, refrigerators	staining and		dry with cloth or sponge. If spotting occurs, wipe with moist
(exterior), fiberglass, formica, glazed	discoloration,		cloth or sponge. If necessary, reapply GOLDSHIELD 5TM
tiles, glazed porcelain, synthetic marble,	and		every three months or when odor, staining and discoloration
plastic, vinyl	fungi (mold		due to bacteria, mold stains, and mildew stains return.
	and mildew)		

MOLD, MILDEW, ODOR PROTECTOR AND INHIBITOR GOLDSHIELD 5™s an antimicrobial agent effective against odor causing bacteria. with COMMENTS **EPA** Letter Dated:

GOLDSHIELD 5TMs an antimicrobial agent effective against bacteria which cause staining and discoloration.

GOLDSHIELD 5TMs an antimicrobial agent effective against fungi (mold and mildew).

GOLDSHIELD 5TMs an antimicrobial agent effective against algae.

JEN 16 2006

83075-1

GOLDSHIELD 5TM, an antimicrobial agent, controls the source of odors on surfaces in the home, in the bathroom, in the kitchen. Under the Federal Insecticide, Bacteriostatic, fungistatic (mold and mildew), algaestatic.

GOLDSHIELD 5TMan antimicrobial agent, inhibits smelly odors caused by mold and mildew that can grow even in the cleanest of code, bornes registered under EPA Reg. No. homes.

GOLDSHIELD 5TM, an antimicrobial agent, inhibits the growth of odor causing bacteria.

Effective on hard non-porous washable bathroom and kitchen surfaces and fixtures around the home.

Effective on modern hard non-porous washable surfaces made of fiberglass, glazed porcelain, Formica®, stainless steel, synthetic marble.

Imparts microbiostatic properties.

Use on carpet and upholstery to inhibit odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew).

Unscented.

Use on carpet and upholstery to inhibit the growth of odor causing bacteria.

Use on carpet and upholstery to inhibit the growth of bacteria which cause staining and discoloration.

Use on carpet and upholstery to inhibit the growth of fungi (mold and mildew).

Use on carpet and upholstery to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae.

Provides an invisible microbiostatic coating to inhibit the growth of odor causing bacteria.

Provides an invisible microbiostatic coating to inhibit the growth of bacteria which cause staining and discoloration.

Provides an invisible microbiostatic coating to inhibit the growth of fungi (mold and mildew).

Provides an invisible microbiostatic coating to inhibit the growth of algae.

Provides an invisible microbiostatic coating to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae.

Prevents deterioration caused by bacteria and fungi (mold and mildew).

Inhibits deterioration caused by bacteria.

### PAGE 13 - MASTER LABEL FOR GOLDSHIELD 5™

Resists development of microbial odors.

Resists development of stains and discoloration due to bacteria.

Resists development of stains due to fungi (mold and mildew).

Resists stains due to algae.

Resists development of microbial odors, stains and discoloration due to bacteria, fungi (mold and mildew) and algae rederal Insecticide, Provides/creates an invisible barrier to inhibit the growth of odor causing bacteria.

Provides/creates an invisible barrier to inhibit the growth of bacteria which cause staining and discolorationistered under EPA Reg. No. Provides/creates an invisible barrier to inhibit the growth of fungi (mold and mildew).

Provides/creates an invisible barrier to inhibit the growth of algae.

Provides/creates an invisible barrier to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae.

Provides/creates an invisible barrier to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae.

### STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

Pesticide Storage: Store in original, tightly closed containers below 30°C (86°F) and above 0°C (32°F) in a secure area inaccessible to children and away from food or feed.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. [For homeowner use the statement will read: "Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site."]

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke. [For homeowner use statement will read: "Container Disposal: Securely wrap original container in several layers of newspaper and discard in trash."]

Note: Any claims for paint use must be for the preservative of the paint in the can. GOLDSHIELD 5TMs to be used as an in can preservative for paints to control the growth of odor causing bacteria, bacteria which causes staining and discoloration, fungi (mold and mildew) and algae.

FOR MORE INFORMATION CONCERNING THIS PRODUCT, PLEASE CONSULT THE MATERIAL SAFETY DATA SHEET (MSDS). THE MSDS CAN BE OBTAINED BY WRITING: NBS Technology, LLC PO Box 428, 157 Skunks Misery Rd, Locust Valley, NY 11560 or emailing: enbst@optonline.net

IMPORTANT: WARRANTY AND DISCLAIMER INFORMATION

JUN 1 6 2006

### PAGE 14 - MASTER LABEL FOR GOLDSHIELD 5TM

NBS Technology, LLC warrants that the product conforms to its chemical description and is reasonably fit for the purposes stated in this bulletin when used in accordance with directions under normal conditions of use; but this warranty of fitness for a particular purpose does not extend to the use of this product contrary to bulletin instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to the seller, and buyer assumes the risk of any such use.

NBS Technology, LLC SPECIFICALLY DISCLAIMS ANY OTHER EXPRESS OR IMPLIED WARRANTY, INCLUDING THE WARRANTY OF MERCHANTABILITY

ACCEPTED with COMMENTS EPA Letter Dated:

JUN 1 6 2006

Under the Federal Insecticide, Pungicide, and Rodenticide Act as amended for the pesticide, registered under EPA Reg. No.

83075-1



## United States Environmental Protection Agency Washington, D.C. 20460

# Office of Prevention, Pesticides and Toxic Substances Office of Pesticides Programs Antimicrobial Division

FAX NUMBER (703)

FACSIMILE REQUEST/COVER SHEET (Please type or print clearly in black ink only)

SEND FAX TO: Name:	Mike Kramer	
Office: Regio	on I	
FAX phone No	732 632 4768	<u> </u>
Office Phone.	732 321 6610	
FROM: Name:	Tracy Lantz	
Division/Branch:	U	
Office Phone No:	703 308 6415	
Mail Code: 7510P  Number of pages (with this		Time: 11.05 AM
Special Message:	Press Release for Gold	dShield
	Rey Notice + Label	
		<del></del>

TRANSMISSION OK

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CONNECTION ID ST. TIME

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RESULT

19 OK

STATED STATES TO SEE

United States Environmental Protection Agency Washington, D.C. 20460

Office of Prevention, Pesticides and Toxic Substances
Office of Pesticides Programs
Antimicrobial Division

FAX NUMBER (703)

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Office Phone.	732 321 6610	
FROM: Name:	Tracy Lantz	
Division/Branch:	AD	
Office Phone No:	703 308 6415	
Mail Code: 7510P  Number of pages (with this		Time: 11:05 AM

114

file in judget

**FOR IMMEDIATE RELEASE:** 

JUNE 19, 2006

CONTACT: Herman Kotler

1.866. NBST.889b

EPA APPROVES NBS TECHNOLOGY LLC'S GOLDSHIELD™ ANTIMICROBIAL

**FORMULATION** 

Locust Valley, N. Y.; NBS Technology LLC announced today the Environmental Protection Agency's approval of their GoldshieldTM5 antimicrobial formulation. GoldshieldTM 5 is derived from an invention NBS secured through an exclusive global license from Emory University, Atlanta GA. It provides the first non-toxic, water stabilized, non-leaching and long lasting residual protection against harmful microorganism, considered by the Center of Disease Control (CDC) to be third largest cause of death behind cancer and heart disease. Tom Higgins, President and CEO said, "This unique antimicrobial can be applied to virtually any surface and it will dramatically reduce the growth and presence of bacteria, fungi, yeasts and certain viruses". NBS and their clients have conducted tests which have demonstrated the efficacy against mold, mildew, algae fungi, Staphylococcus aureus, MRSA, Salmonella, E.coli, VRE, pseudomonas, and HIV B and many others. The implications and validation of these test results and the long lasting protection GoldshieldTM 5 affords will provide many industry sectors with a solution to the microbial contamination they deal with daily. NBS will initially focus its marketing activities to healthcare, hospitality, food and beverage processing, the agri-business, consumer products, marine industry, institutional and industrial sectors and the textile industry.

### GOLDSHIELD - Page 2 of 2

This patented Goldshield™ formula is easy to ship, apply and store-it is non-flammable and otherwise environmentally benign. Another significant advantage of Goldshield™ over conventional disinfectants and antimicrobials is that there is no known or anticipated risk for pathogens to genetically adapt.

"This technology represents a significant step forward in antimicrobial and disinfectant technologies," Mr. Higgins said. "It can revolutionize the approach to the prevention of cross-contamination."

NBS is seeking to develop relationships with users and distributors of its products worldwide. These relationships may be constructed as distribution agreements, licensing agreements, joint venture agreements and direct sales. For more information, contact: NBS Technology, LLC, P.O. Box 428, 157 Skunks Misery Rd., Locust Valley, N.Y 11560; phone: 516.674.4085; email: <a href="mailto:enbst@optonline.net">enbst@optonline.net</a>. www.nbsgoldshield.com

- ### -

TASK ASSIGNMENT FORM Antimicrobial Division/Regulatory Management Branch II .... Completed by Product Manager PRODUCT REVIEWER: RMB II EPA File Symbol/Reg No Description of Action: 307 Decision No. Submission No. Fee for Service Action Code: FQPA Action Code: Non-FQPA Action Code: Fee for Service Fee: \$ 2005 2006 APPLICATION DATE EPA PIN DATE 2006. REVIEWER ASSIGNED DATE 2003 2006 DATE DUE FROM SCIENCE 2005 DATE DUE TOPM PSB Acute PSB ... Type of Data: I PSB Product RASSB RASSB RASSB RASSB Chemistry & Toxicology D Environmental Chronic Efficacy Ecological Exposure Toxicology O NOTE TO ARCTIC SLOPE · PLEASE COMPLETE PART B OF FORM. COMMENTS: Bear Sulpri Entire package rec'd For Arctic Slope Contract Only ARCTIC SLOPEMAN Contractor: Arche Slope Final Task: Signature Draft Task: Signature (Total hrs) (Estairs)

# Fee for Service



This package includes the following	for Division
<ul><li>New Registration</li><li>Amendment</li></ul>	● AD ○ BPPD ○ RD
□ Studies? □ Fee Waiver? □ volpay % Reduction:	Risk Mgr. 31
Receipt No. S-[	× 793124
EPA File Symbol/Reg. No.	83075-R
Pin-Punch Date:	4/13/06
This item is NOT subject to I	FFS action.
Action Code:	Parent/Child Decisions:
Requested:	
Granted:	
Amount Due: \$	
Human Studies:	ite-All Selective Support
Tox (excluding Six-Pack)	
Other Human Research (efficacy, exposure,	etc.)
Reviewer: Z. Jones   D. Williams	Date: 4 14 06
Remarks:	
This Submission is to the Product Chem.	the response

TX REPORT **********

TRANSMISSION OK

TX/RX NO CONNECTION TEL SUBADDRESS CONNECTION ID ST. TIME USAGE T PGS.

RESULT

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OK

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Mail Code:___

7510P Number of pages (with this cover sheet):

### United States Environmental Protection Agency Washington, D.C. 20460

Office of Prevention, Pesticides and Toxic Substances Office of Pesticides Programs Antimicrobial Division

FAX NUMBER (703)

FACSIMILE REQUEST/COVER SHEET (Please type or print clearly in black ink only)

Time: 11.45

SEND FAX TO: Name:	Jeff Jones	
Office:	Delta Analytical	
FAX phone No	301 680 7975	
Office Phone	301 680 7971	
FROM: Name:	Tracy Lantz	
Division/Branch:	Ó	
Office Phone No:		



## United States Environmental Protection Agency Washington, D.C. 20460

# Office of Prevention, Pesticides and Toxic Substances Office of Pesticides Programs Antimicrobial Division

FAX NUMBER (703)

FACSIMILE REQUEST/COVER SHEET (Please type or print clearly in black ink only)

SEND FAX TO: Name:	Jeft Jones
Office:	Delta Analytical
FAX phone No	301 680 7975
Office Phone.	301 680 7971
FROM: Name:	Tracy Lantz
Division/Branch:	
Office Phone No:	
Mail Code: 7510P  Number of pages (with this of	
Special Message:	Reg. Notice for 83075-1



Tracy Lantz/DC/USEPA/US 06/16/2006 10:19 AM

To dennis edwrds, Velma Noble/DC/USEPA/US

CC

bcc

Subject 83075-R for Jeff Jones

This is the PRIA which received a do not grant letter. It came back in as an FQPA. As far as I can tell it was never put back in the system.

I will be completing this submission today. We need to figure out a way to put it in (arrived May 9) and then log out on June 16th.

I need to recieve credit for this submission and OPPIN needs to record that this product was actually registered.



Dennis Edwards/DC/USEPA/US 06/15/2006 09:12 PM To Tracy Lantz/DC/USEPA/US@EPA

CC

bcc

Subject Re: signature for 83075-R promised tomorrow

If its ready tomorrow you sign it.

Dennis Edwards
Antimicrobials Division
703-308-8087
Tracy Lantz/DC/USEPA/US



Tracy Lantz/DC/USEPA/US 06/15/2006 06:58 PM

To Dennis Edwards/DC/USEPA/US@EPA

C

Subject signature for 83075-R promised tomorrow

Who should sign the Goldshield letter for Jeff Jones? If Marshall is in, should he sign it?
Or do I sign it?

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAR - 3 2004

Mr. Timothy C. Moses President, Antimicrobials & Biocides Division Nova BioGenetics, Inc. 8601 Dunwoody Pl., Suite 338 Atlanta, GA 30350

me label

SUBJECT:

BioShield AM500

EPA Registration Number: 75497-1 Application Dated: December 1, 2003 Receipt Date: December 9, 2003

Dear Mr. Timothy C. Moses:

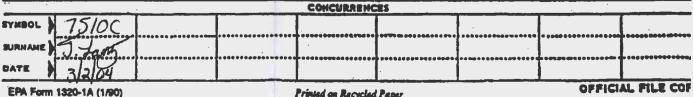
The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable subject to the conditions listed below.

Correct name of Active Ingredient as per Agency request

### **Conditions**

Make the following revisions to the label:

- 1. In future submissions to the Agency, list all packaging sizes on the Application for Pesticide such that the application is in agreement with the label for this product.
- 2. Revise the Directions for Use for Approved Commercial and Industrial Applications by changing the second paragraph as follows: "Prepare solutions by simply adding AM 500 to solvent and stirring. Dilute AM 500 by adding..." such that this label incorporates mandatory language as per PR Notice 2000-5.
- 3. Revise the use site beginning: "AM500 can be used in paints and coatings as an in can preservative for..." by correcting the spelling of preservative.
- 4. Add the following clarification to the Approved Homeowner uses section of the label (page 10): "Buffer pads (polishing and abrasive) Polyurethane and cellulose foam for household. industrial and institutional sponges and mops..."



Printed on Recycled Paper

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

- 5. Revise the bullet on page 11 as follows: "Effective on modern hard non-porous washable surfaces made of fiberglass, glazed porcelain Formica..."
- 6. Add the following language to page 12 of the label as per the Agency letter of 5/30/02: "Note: Any claims for paint use must be for the preservative of the paint in the can. AM 500 is to be used as an in can preservative for paints to control the growth of odor causing bacteria, bacteria which causes staining and discoloration, fungi (mold and mildew) and algae."

### **General Comments**

A stamped copy of the accepted labeling, including technical bulletin, is enclosed. Submit one (1) copy of your final printed labeling before distributing or selling the product bearing the revised labeling. Should you have any questions concerning this letter, please contact Tracy Lantz at (703) 308-6415.

Sincerely.

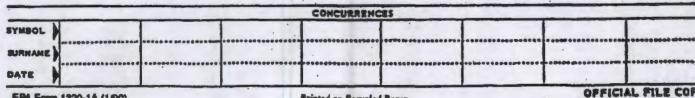
Velma Noble

Product Manager (31)

Regulatory Management Branch I Antimicrobials Division (7510C).

Enclosure: Stamped Label

7510C:T.Lantz:3/1/04:75497-1a



EPA Form 1320-1A (1/90)

Printed on Recycled Paper



ACCEPTED

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in EPA Loner Elaboric

MAR 3 200

### BIOSHIELD® AM 500 MICROBIOSTATIC AGENT

A Sillcone Quaternary Ammonium Salt

C AGENT To for the forcion of the contention, the force of the force of the contention, the force of the contention, the force of the contention of the content of

Other Ingredients:	3-(trihydroxysilyl) propyldimethyloctadecyl ammonium chloride	5.0% 95.0%
TOTAL INGREDIENTS:		100.0%

### WARNING

NET CONTENTS: 2, 4, 8, 16, 20, 22, or 36 fluid oz.; 1, 5, 55, 150, or 300 gal.

EPA EST. xxxxx-GA-xx

 	 	 	 <u> </u>	

### FIRST AID

Have the product container or label with you when calling the poison control center or doctor, or going for treatment.

### IF IN EYES:

EPA Reg. No. 75497-1

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
- Call poison control center or doctor for treatment advice.

### IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.
- Call a poison control center or doctor for futher treatment advice.

### IF ON SKIN:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

### IF SWALLCWED:

Sec. 9. 64 . 1 . 1 . 1

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

### PAGE 2 - MASTER LABEL FOR AM 500

A microbiostatic agent is an agent that inhibits the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae. This product does not protect users or others against food-borne or disease-causing bacteria.

### PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING. Causes substantial but temporary eye injury. Harmful if absorbed through skin or inhaled. Do not get in eyes. Avoid contact with skin and avoid breathing vapor. Wear protective eyewear (goggles or face shield). Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

### **ENVIRONMENTAL HAZARDS**

Commercial and industrial uses: This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

De-activation may be required during clean up if a spill occurs. De-activation of AM 500 can be achieved by the addition of anionic surfactant (such as soap, sulfonates, sulfates) in quantity equivalent to that of AM 500.

ACCEPTED

Homeowner use: This pesticide is toxic to fish. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of pesticide.

### DIRECTIONS FOR USE Approved commercial and industrial Applications

Under the 150 and 15 recticide, Pungfiside, and 16 decisione Act as

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Wear protective eyewear (goggles or face shield) and gloves when using this product. Dry treated areas and articles such as clothing before use? Remove children and pets from treated area until completely dry.

Prepare solutions by simply adding AM 500 to solvent and stirring. AM 500 can also be diluted by adding 0.2 to 2 fluid ounces of AM 500 per cup (3.2 to 32 fluid ounces of AM 500 per gallon) of water or other solvents (for example, alcohol and ketones) and then applied to organic or inorganic substrates by brushing, dipping, padding, soaking, spraying, fogging or by using foam finishing techniques to give a final treatment of 0.1 to 1.0 percent by weight active ingredient.

Dry substrates at temperatures from ambient to a maximum of 160° C (320° F) to effect complete condensation of silanol groups and to remove water, solvents and/or traces of methanol from hydrolysis. Optimum application and drying conditions, such as time and temperature, should be determined for each application before use. If necessary, reapply AM 500 every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.

PAGE 3 - MASTER LABEL FOR AM 500

AM 500 when used as a concrete additive is additive during concrete preparation. Use 6 fluid ounces AM 500 per cubic feet of concrete. Add to water before addition of concrete. Addition of AM 500 reduces deterioration of sewer pipes and manholes by inhibiting microbiologically induced corrosion.

AM500 when used as an additive for paints and coatings is added directly during preparation of the paint or coating. Use 5 pounds of AM500 per 100 pounds of paint or coating (or 1 pound AM500 per 20 pounds paint/coating). The addition of the antimicrobial agent (AM500) to paints at the point of manufacture preserves the paint in the can as well as the dried paint film. AM500 inhabits the growth of odor causing bacteria, bacteria which causes staining and discoloration, fungi(mold and mildew), and alge on the surface of dried films and coatings.

### Approved commercial and industrial applications

The active ingredient in AM 500 is effective against odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae as a static agent. AM 500 can be used as a final bacteriostatic finish on the following items to impart bacteriostatic/fungistatic (mold and mildew) activity.

• Air filters for furnaces, air-conditioners, air purification devices, automobiles, recirculating air handling systems in EPV Leger Dated:

Air filters/materials

Aquarium filter material

- Bed sheets, blankets, and bedspreads
- Buffer pads (abrasive and polishing)
- Carpets and draperies
- Cellulose sponges
- Concrete additive for sewer pipes, manholes and concrete sewer structures; not to be used in treatment of storm drains
- Concrete additive for repair and renewal of sewer pipes and manholes and concrete sewer structures; not to be used in treatment of storm drains
- Exterior walls (such as stone, concrete, brick)

The state of the s

- Fiberfill for upholstery, sleeping bags, apparel, where the fiber is cotton, natural down, nylon, polyester, rayon, or wool
- Fiberglass ductboard
- Fire hose fabric
- Humidifier belts
- Mattress pads and ticking
- Mens underwear and outerwear
- Non-woven disposable diapers
- Non-woven polyester
- Outerwear apparel (jackets, sweaters, sweatshirts, coats, raincoats, overcoats, jerseys, ponchos)
- AM500 can be used in paints and coatings as an in can presertive for protection of paint film and coating film. Types of paints
  and coatings include: latex indoor/outdoor paints and stains, woodstains, architectural paints, laquer and maintenance coatings,
  films, laminates and finishes including alkyd, urethane, enamel, epoxy, siloxaline, amino resins, textile coatings, extrusion

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Fine paids, and the control of Act at
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1, and the display of A Reg. No.
75497-1

5/14

### PAGE 4 - MASTER LABEL FOR AM 500.



coatings, architural coatings and overlays, anti-corrosion coatings, fire-resistant coatings, aliphatic coatings, vinylester and polyester coatings, gel coatings, amino resins, resins used as additive mixes for cement, epoxy laminating resins, and blends and copolymers thereof;

- · Polyurethane and cellulose foam for household, industrial, and institutional sponges and mops
- · Polyurethane and polyethylene foam, when covered
- Polyurethane foam for packaging and cushioning in non-food contact applications
- · Polyurethane foam used as a growth medium for non-food crops and plants
- Pre-moistened towelettes and tissue wipes (these do not impart pesticidal properties)
- · Roofing materials defined as shingles, roofing granules, wood shakes, felt, stone and synthetic overcoats
- · Sand bags, tents, tarpaulins, sails, and ropes
- Athletic and casual shoes
- Shoe insoles
- Shower curtains
- Socks comprised of nylon, nylon/orlon, cotton/nylon, linen/Lycra, acrylic/polypropylene/nylon/Lycra, wool/silk/nylon/Lycra and wool/acrylic/nylon/Lycra
- Throw rugs
- Toweling made of 100 percent cotton, 100 percent polyester, and blends of the two fibers
- Toilet tank and seat covers
- Umbrellas
- Upholstery made of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefins, polypropylene, rayon, spandex, vinyl, wool
- Vacuum cleaner bags and filters
- Vinyl paper-wallpaper for non-food contact surfaces
- Disposable wiping cloths that can be used for multiple purposes such as dusting or washing furniture, cars, walls, windows, floors, appliances, dishes, counter tops; the wiping cloths do not impart pesticide properties
- Women's hosiery
- · Women's intimate apparel

ACCEPTED

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MAR \$ 2004

Useker for Police Hassociade, Fungicide, and Redenticide Act as amended, for the posticide, registered under EPA Reg. No.

75497-

### **DIRECTIONS FOR USE**

Approved commercial applications used in homes, offices, automobiles and institutions e.g., schools, hospitals, daycare centers, churches, correctional facilities

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Wear protective eyewear (goggles or face shield) and gloves when using this product. Dry treated areas and articles such as clothing before use. Remove children and pets from treated area until completely dry. Clean surfaces prior to application.

For Pump Spray Application: Dilute 8 ounces of AM 500 per gallon of water (2 oz. per quart; 1oz. per pint). Using pump sprayer, spray entire area 4"- 6"s from the surface making sure the surface is completely covered. Apply and then let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test for staining and color-fastness of fabrics and carpets by treating and drying a small, concealed area prior to application. AM 500 treats approximately 200 square feet per diluted gallon of water. When treating coarser substrates, more AM 500 may be required due to absorption. A fan may be used to assist in drying carpeting.

For Commercial Spray Application: For commercial application equipment (i.e. carpet/upholstery steamers, rotary jet extraction cleaners, pressure sprayers) dilute 8 ounces of AM 500 per gallon of water (2 oz. per quart; 1oz. per pint); mix well. Apply and then let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test for staining and color-fastness of fabrics and carpets by treating and drying a small, concealed area prior to application. AM 500 treats approximately 200 square feet per diluted gallon of water. When treating coarser substrates, more AM 500 may be required due to absorption. Dry carpet areas and surfaces before re-entry and dry articles before use. A fan may be used to assist in drying carpeting.

For Dipping/Soaking Application: Use appropriate sized wash basin or tub for dipping/soaking the item you are treating. Use enough AM 500 solution to completely submerge item. Dilute 8 ounces of AM 500 per gallon of water (2 oz. per quart; 1oz. per pint); mix well. Completely submerge item in solution for 3 minutes. Remove item and dry. Test for staining and color-fastness of fabrics by treating and drying a small, concealed area prior to application. Do not reuse solution after dipping/soaking.

The substrate can be dried at room temperatures or at temperatures to a maximum of 160° C (320° F), for example in a clothes dryer. Remove excess liquid before attempting to dry in a clothes dryer. If necessary, reapply AM 500 every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.

Approved commercial applications in homes, offices, automobiles and institutions and instit

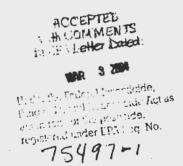
The active ingredient in AM 500 is effective against odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae as a static agent.

AM 500 can be used as a final bacteriostatic finish on the following items to impart bacteriostatic/fungistatic (mold and mildew) activity.



- Air filters for furnaces, air-conditioners, air purification devices, automobiles, recirculating air handling systems
- Air filters/materials
- Aquarium filter material
- · Bed sheets, blankets, and bedspreads
- Buffer pads (abrasive and polishing)
- · Carpets and draperies
- Cellulose sponges
- Exterior walls(such as stone, concrete, brick)
- Fiberfill for upholstery, sleeping bags, apparel, where the fiber is cotton, natural down, nylon, polyester, rayon, or wool
- Fiberglass ductboard
- Fire hose fabric
- Humidifier belts
- Mattress pads and ticking
- Mens underwear and outerwear
- Non-woven polyester
- Outerwear apparel (jackets, sweaters, sweatshirts, coats, raincoats, overcoats, jerseys, ponchos)
- Polyurethane and cellulose foam for household, industrial, and institutional sponges and mops
- Polyurethane and polyethylene foam, when covered
- Polyurethane foam for packaging and cushioning in nonfood contact applications
- Polyurethane foam used as a growth medium for non-food crops and plants

- Roofing materials defined as shingles, roofing granules, wood shakes, felt, stone and synthetic overcoats
- Sand bags, tents, tarpaulins, sails, and ropes
- · Athletic and casual shoes
- Shoe insoles
- Shower curtains
- Socks comprised of nylon, nylon/orlon, cotton/nylon, linen/Lycra, acrylic/polypropylene/nylon/Lycra, wool/silk/nylon/Lycra and wool/acrylic/nylon/Lycra
- Throw rugs
- Toweling made of 100 percent cotton, 100 percent polyester, and blends of the two fibers
- · Toilet tank and seat covers
- Umbrellas
- Upholstery made of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefins, polypropylene, rayon, spandex, vinyl, wool
- Vacuum cleaner bags and finers
- Vinyl paper-wallpaper for non-food contact surfaces
- Disposable wiping cloths that can be used for multiple purposes such as dusting or washing furniture, cars, walls, windows, floors, appliances, dishes, counter tops; the wiping cloths do not impart pesticide properties
- Women's hosiery
- Women's intimate apparel



### DIRECTIONS FOR USE For homeowner applications

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Wear protective eyewear (goggles or face <a href="shield">shield</a>) and gloves when using this product. Dry treated areas and articles such as clothing before use. Remove children and pets from treated area until completely dry. Clean surfaces prior to application.

### **Approved homeowner uses**

The active ingredient in AM 500 is effective against odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae as a static agent. AM 500 can be used as a final bacteriostatic finish on the following items to impart

bacteriostatic/fungistatic (mold and mildew) activity.

osetarosistic/tunojstatic (molo silo milote.	Pest controlled	Dilution Rate	Method of Application
Bedsheets, blankets, bedspreads, curtains, draperies (washable only), underwear, socks, intimate apparel, hoisery, throw rugs, toweling, toilet tank covers, shower curtains, shoe insoles, outerwear apparel (jackets, sweaters, sweatshirts, coats, raincoats, overcoats, jerseys, ponchos). AM 500 can be applied to fabrics made of acetates, acrylics, cotton, fiberglass, linen, Lycra, nylon, orlon, polyester, polyethylene, polyolefins, polypropylene, rayon, silk, spandex, vinyl, and wool	While Committee and the Fernance and the registered up	8 oz./ gallon 2 oz./ quart 1 oz./pint 1 oz./pint 2 oz./ pint 3 cost of the literature in the literatur	DIP/SOAK: Dilute AM 500 in water; mix well. Use appropriate sized wash basin or tub for dipping/soaking the itlem you are treating. Use enough AM 500 solution to completely submerge item. Keep item in solution for 3 minutes. Remove item and wring excess liquid. Drying may be attained by dripping dry or wringing excess liquid from treated item. For larger items (e.g., bedspreads, curtains, draperies), place in washing machine on spin cycle to aid in the removal of excess liquid. Test staining and color-fastness of fabric and carpets by treating and drying a small concealed area prior to application. Do not reuse solution after dipping/soaking. Dry treated articles before use. Substrates can be hang-dried at room temperature or at temperatures to a maximum of 160 °C (320 °F); (for example in a clothes dryer). If necessary, reapply AM 500 every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.  SPRAY: Dilute AM 500 in water; mix well. Clean surface prior to application. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4"-6" from the surface making sure the surface is completely covered. Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. Test staining and color-fastness of fabric by treating and drying a small concealed area prior to

PAGE 8 - MASTER LABEL FOR AM 500			<u> </u>
		•	application. If necessary, reapply AM 500 every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.
	Pest controlled	Dilution Rate	Method of Application
Air filters and air filter material for  Furnaces, air conditioners  Air purification systems  Automobiles  Recirculating air handling systems  Vacuum cleaner filters  Aquanums	Odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae	8 oz./ gallon 2 oz./ quart 1 oz./pint	SPRAY: Dilute AM 500 in water; mix well. When treating filters, remove filter from the unit. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4"- 6" from the surface making sure the surface is completely covered. Apply and then let stand until dry. If necessary, reapply AM 500 every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.
	Pest controlled	Dilution Rate	Method of Application
Carpeling	Odor causing bacteria, bacteria which cause staining and	8 cz./ galion 2 cz./ quart 1 cz./pint	SPRAY: Dilute AM 500 in water; mix well. Apply to clean carpet surface. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4"- 6" from the surface making sure the surface is completely covered. For rotary jet extraction cleaners and carpet steamers, add the diluted
	discoloration, and fungi (mold and mildew)	DENTED DEALERS Dated: 9 2004	AM 500 solution directly to the cleaning tank, then operate the equipment in accordance with manufacturer's instructions. Apply and then let stand until dry. Test staining and color-fastness of carpets by treating and drying a small concealed area prior to application. AM 500 treats approximately 200 square feet per diluted gallon of water. When treating coarser substrates (e.g., wool carpeting), more AM 500 may be required due to absorption. Dry carpet areas and surfaces before re-entry. A fan may be used to
	er ar 1.6 Ta	res insecticide, le	assist in drying carpeting. Remove children and pets from treated area until completely dried. If necessary, reapply AM 500 every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.

PAGE 9 - MASTER LABEL FOR AM 500

	Pest controlled	Dilution Rate	Method of Application
Mattress pad and mattress ticking and upholstery composed of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefins, polypropylene, rayon, spandex, vinyl, wool; fiberfill to be used in upholstery, sleeping bags, apparel, where the fiber is cotton, natural down, nylon, rayon or wool	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	8 oz./ gallon 2 oz./ quart 1 oz./pint	SPRAY: Dilute AM 500 in water; mix well. Clean surfaces prior to application. Using a trigger pump sprayer spray the entire surface area 4"- 6" from the surface making sure the surface is completely covered. Apply and then let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test staining and color-fastness of fabric by treating and drying a small concealed area prior to application. When applying to mattress pads and ticking do not soak. Remove children and pets from treated area until completely dried. If necessary, reapply AM 500 every three months or when odor, staining and discoloration due to bacteria, mold stains and mildew stains return.
	Pest	Dilution	Method of Application
	controlled	Rate	
Tents, tarpaulins, sails, ropes.	Odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae	8 oz./ gallon 2 oz./ quart 1 oz./pint	SPRAY: Dilute AM 500 in water; mix well. Clean surface prior to application. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4"-6" from the surface making sure the surface is completely covered. Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test staining and color-fastness of fabric by treating and drying a small concealed area prior to application. If necessary, reapply AM 500 every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.
	with CC in EPA L	ladi, irida est es e postádil r EFA Regliko.	DIP/SOAK: Dilute AM 500 in water and mix well. Use appropriate sized wash basin or tub for dipping/soaking the item you are treating. Use enough AM 500 solution to completely submerge item. Keep item in solution for three minutes. Remove item and wring excess liquid. Test staining and color-fastness of fabric by treating and drying a small concealed area prior to application. Do not reuse solution after dipping/soaking. Dry treated articles before use. Substrates can be hang-dried at room temperature or at temperatures to a maximum of 160 °C (320 °F); (for

PAGE 10 - MASTER LABEL FOR AM 500

			example in a clothes dryer). Remove excess liquid before attempting to dry in a clothes dryer. If necessary, reapply AM 500 every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.		
	Pest controlled	Dilution Rate	Method of Application		
Roofing materials (such as shingles, roofing granules, wood shakes, felt, stone, synthetic overcoats) Exterior walls (such as stone, concrete, brick)	Odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae	8 oz./ gallon 2 oz./ quart 1 oz./pint	SPRAY: Dilute AM 500 in water; mix well. Make sure the roof or wall is clean prior to application. Using a pressure sprayer, spray the entire surface area 6"-12" from the surface making sure the surface is completely covered. After applying the dilute solution of AM 500, let stand until dry. AM 500 treats approximately 200 square feet of roofing or wall per diluted gallon of water. If necessary, reapply AM 500 every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.		
	Pest controlled	Dilution Rate	Method of Application		
Buffer pads (polishing and abrasive), Polyurethane for household sponges and mops, vacuum cleaner bags, umbrellas, casual shoes, athletic shoes	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	8 oz./ gallon 2 oz./ quart 1 oz./pint	SPRAY: Dilute AM 500 in water; mix well. Clean surface prior to application. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4°-6" from the surface making sure the surface is completely covered. Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. If necessary, reapply AM 500 every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.		
	Pest controlled	Dilution Rate	Method of Application		
Tubs, glazed tiles, vanity tops, shower curtains, shower stalls (areas), sinks, washable walls, wall paper for non-food contact, floors, window sills, cabinets, garbage cans, appliances, refrigerators (exterior), fiberglass, formica, glazed tiles, glazed purcelain, synthetic marbie, plastic, vinyl	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew) ³ :	8 oz./ gallon 2 oz./ quart 1 oz./pint // COLVETED with COLVETED in HAR / Cotto	SPRAY: Dilute AM 500 in water; mix well. Using a trigger pump sprayer, spray the entire surface area 4°- 6" from the surface making sure the surface is completely covered. Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. If necessary, reapply AM 500 every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.		

amended, for the pesticide, registered under EPA Reg. No.

#### PAGE 11 - MASTER LABEL FOR AM 500

MOLD, MILDEW, ODOR PROTECTOR AND INHIBITOR AM 500 is an antimicrobial agent effective against odor causing bacteria.

AM 500 is an antimicrobial agent effective against bacteria which cause staining and discoloration.

AM 500 is an antimicrobial agent effective against fungi (mold and mildew).

AM 500 is an antimicrobial agent effective against algae.

AM 500, an antimicrobial agent, controls the source of odors on surfaces in the home, in the bathroom, in the kitchen.

Bacteriostatic, fungistatic (mold and mildew), algaestatic.

AM 500, an antimicrobial agent, inhibits smelly odors caused by mold and mildew that can grow even in the cleanest of homes.

AM 500, an antimicrobial agent, inhibits the growth of odor causing bacteria.

Effective on hard non-porous washable bathroom and kitchen surfaces and fixtures around the home.

Effective on modern hard non-porous washable surfaces like fiberglass, glazed porcelain, Formica®, stainless steel, synthetic marble.

Imparts microbiostatic properties.

Use on carpet and upho!stery to inhibit odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew).

Unscented.

Use on carpet and upholstery to inhibit the growth of odor causing bacteria.

Use on carpet and upholstery to inhibit the growth of bacteria which cause staining and discoloration.

Use on carpet and uphoistery to inhibit the growth of fungi (mold and mildew).

Use on carpet and upholstery to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae.

Provides an invisible microbiostatic coating to inhibit the growth of odor causing bacteria.

Provides an invisible microbiostatic coating to inhibit the growth of bacteria which cause staining and discoloration.

Provides an invisible microbiostatic coating to inhibit the growth of fungi (mold and mildew).

Provides an invisible microbiostatic coating to inhibit the growth of algae.

Provides an invisible microbiostatic coating to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae.

Prevents deterioration caused by bacteria and fungi (mold and mildew).

Inhibits deterioration caused by bacteria.

Resists development of microbial odors.

Resists development of stains and discoloration due to bacteria.

Resists development of stains due to fungi (mold and mildew).

Resists stains due to algae.

Resists development of microbial odors, stains and discoloration due to bacteria, fungi (mold and mildew), and algae.

Provides/creates an invisible barrier to inhibit the crowth of oder covering besteries.

Provides/creates an invisible barrier to inhibit the growth of odor causing bacteria.

Provides/creates an invisible barrier to inhibit the growth of bacteria which cause staining and discoloration.

Provides/creates an invisible barrier to inhibit the growth of fungi (mold and mildew).

Provides/creares an invisible barrier to inhibit the growth of algae.

Provides/creates an invisible barrier to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration. fungi (mold and mildew), and algae.

#### PAGE 12 - MASTER LABEL FOR AM 500

### STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

Pesticide Storage: Store in original, tightly closed containers below 30°C (86°F) and above 0°C (32°F) in a secure area inaccessible to children and away from food or feed.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. [For homeowner use the statement will read: "Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site."]

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke. [For homeowner use statement will read: "Container Disposal: Securely wrap original container in several layers of newspaper and discard in trash."]

FOR MORE INFORMATION CONCERNING THIS PRODUCT, PLEASE CONSULT THE MATERIAL SAFETY DATA SHEET (MSDS). THE MSDS CAN BE OBTAINED BY WRITING Nova BioGenetics Inc. 8601 Dunwoody Place, Suite 338, Atlanta, Georgia 30350 or obtain from our website www.novabiogenetics.com

### IMPORTANT: WARRANTY AND DISCLAIMER INFORMATION

Nova BioGenetics Inc., warrants that the product conforms to its chemical description and is reasonably fit for the purposes stated in this bulletin when used in accordance with directions under normal conditions of use; but this warranty of fitness for a particular purpose does not extend to the use of this product contrary to bulletin instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to the seller, and buyer assumes the risk of any such use.

Nova SPECIFICALLY DISCLAIMS ANY OTHER EXPRESS OR IMPLIED WARRANTY, INCLUDING THE WARRANTY OF MERCHANTABILITY

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Tracy Lantz/DC/USEPA/US 06/15/2006 05:41 PM To jjones@delta-ac.com

CC

bcc

Subject Fw: Submission for Gold Shield 5 83075-R

I have reviewed the data matrix which you sent dated 6/14/06.

Please revise this matrix to be in agreement with the note attached below in which you agreed to use the "cite-all" method of support for dermal sensitization. The waiver request you submitted is not acceptable. In addition, please check the MRIDs associated with guidelines: 830.6314, 6315, 6316, 6319, 6321, 7000, 7100, and 7300 as I believe you should be referencing MRID 46731901 not 46718501 to support these data requirements.

Also include a revised certification with respect to citation of data form for the product specific data requirements which includes the corrected active ingredient name.

Please send these revised matrix and data comp. forms to me via e-mail as soon as possible.

#### **Thanks**

---- Forwarded by Tracy Lantz/DC/USEPA/US on 06/15/2006 05:44 PM -----



Jeff Jones <jjones@delta-ac.com> 02/01/2006 03:11 PM

To Tracy Lantz/DC/USEPA/US@EPA

cc "Tom Higgins" <thigginsnbst@optonline.net>, Stuart Kaufman <sknbst@optonline.net>

Subject RE: Submission for Gold Shield 5 83075-R

### Tracy:

Attached please find a revised data matrix changing our method of data support to "cite-all" for dermal sensitization as you requested. Let me know if you need anything else.

Can you tell me what the decision due date is for this application? Thanks.

Best regards,

Jeff Jones jjones@delta-ac.com



revised data matrix signed 1 Feb 2006.pdf

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street S.W. Washington, D.C. 20460

	ENU-	USE DATA MAT	KIA						
Date: 15 June 2006	EPA Reg. No./File: 83075-R		Page 1 of 2						
Applicant's/Registrant Name & / Prosperity Drive, Silver Spring, I	Product: Gold Shield 5								
Ingredient(s): 3-(trihydroxysilyl) propyl dimethyl octadecyl ammonium chloride									
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note				
830.1550	Product identity and composition	48718501 K	NBS Technology, LLC	OWN					
830.1600	Description of the materials used to produce the product	46718501 _X	NBS Technology, LLC	own					
830.1650	Description of the manufacturing process	46718501 ,	NBS Technology, LLC	own					
830.1670	Discussion of the formation of impurities	46718501 y	NBS Technology, LLC	own					
830.1750	Certified Limits	46718501	NBS Technology, LLC	own					
830.1800	Enforcement analytical method	ТВА	NBS Technology, LLC	OWN	submitted electronically and by hard copy (8 May 2006)				
830.6303	Physical state	46731901 x	NBS Technology, LLC	OWN					
830.6314	Oxidation/reduction: chemical compatibility	46731901 K	NBS Technology, LLC	OWN					
830.6315	Flammability	46731901 v	NBS Technology, LLC	OWN					
830.6316	Explodability	46731901 X	NBS Technology, LLC	own					
830.6317	Storage stability				to be submitted				
B30.6319	Miscibility	48731901 (	NBS Technology, LLC	OWN					
830.6320	Corrosion characteristics				to be submitted				
830.6321	Dielectric breakdown voltage	48731901 K	NBS Technology, LLC	own					
830.7000	рН	48731901 K	NBS Technology, LLC	own					
B30.7100	Viscosity	46731901 /	NBS Technology, LLC	OWN					
330,7300	Density/relative density/bulk density	46731901	NBS Technology, LLC	OWN					

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street S.W. Washington, D.C. 20460

#### **END-USE DATA MATRIX** Date: 15 June 2006 EPA Reg. No./File: 83075-R Page 2 of 2 Applicant's/Registrant Name & Address: NBS Technology, LLC c/o Delta Analytical Corporation, 12510 Product: Gold Shield 5 Prosperity Drive, Suite 160, Silver Spring, MD 20904 Ingredient(s):3-(trihydroxysilyi) propyl dimethyl octadecyl ammonium chloride **MRID Number** Submitter Guldeline Reference Number Guideline Study Name Status Note 870.1100 Acute oral toxicity - rat PAY see attachment 1 for list of cite-ali companies to which offer to pay letters have been sent PAY 870,1200 Acute dermal toxicity - rabbit cite-all 870,1300 Acute inhalation toxicity - rat cite-all PAY 870.2400 44553501 Bloshield Technologies, Inc. PAY Primary eye irritation - rabbit Offer to pay letter sent to 44789801 75497-1 75497-2 Bioshield Technologies, Inc. 870.2500 Primary dermal irritation cite-all PAY see attachment 1 for list of X. companies to which offer to pay letters have been sent cite-all PAY 870.2600 Dermal sensitization Name & Title: Tom Higgins, President, NBS Technology, LLC Date: 15 June 2006 Tom Hogin of

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### Attachment I List of Companies to Which Offer to Pay Letters Have Been Sent

CHEMICAL CHEMICAL NAME 1-Octadecanaminium, N, N-dimethyl-N-(3-(trimethoxysilyl)propyl)-, chloride 107401 NALCO DIVERSIFIED TECHNOLOGIES, INC. COMPANY# 008591 * DATA TYPES * PO BOX 200 EU AT EC FW EF OT CHAGRIN FALLS, OH 44022 XX XX COMPANY# 048737
* DATA TYPES * GOULSTON TECHNOLOGIES, INC. 700 N. JOHNSON ST. EU AT EC FW EF OT MONROE, NC 28110 AMERICAN CHEMISTRY COUNCIL BIOCIDES PANEL COMPANY# 063394 * DATA TYPES * 1300 WILSON BLVD ARLINGTON, VA 22209 EU AT EC FW EF OT AEGIS ENVIRONMENTAL MANAGEMENT INC COMPANY# 064881 * DATA TYPES * 2205 RIDGEWOOD DRIVE EU AT EC FW EF OT MIDLAND, MI 48642 XX XX XX XX XX SPRAY DRIFT TASK FORCE 1900 K STREET, NW COMPANY# 066607 * DATA TYPES * EU AT EC FW EF OT WASHINGTON, DC 20006 BIOSHIELD TECHNOLOGIES, INC COMPANY# 070871 * DATA TYPES * 4405 INTERNATIONAL BLVD - STE B109 EU AT EC FW EF OT NORCROSS, GA 30093 XX XX SISHIELD TECHNOLOGIES, INC. COMPANY# 075174 * DATA TYPES * 17 EXECUTIVE PARK DRIVE, SUITE 563 EU AT EC FW EF OT ATLANTA, GA 30329 LAIRD'S REGULATORY CONSULTANTS INC. COMPANY# 079652 * DATA TYPES * Agent for: MARINIZE PRODUCTS, INC. SHENSTONE EST. 17804 BRAEMAR PL EU AT EC FW EF OT OT SHENSTONE EST. 1760 XX LEESBURG, VA 20176 COMPANY# 081260 JENNICO2 INC. * DATA TYPES * 4494 ANDERSON DRIVE EU AT EC FW EF OT EAU CLAIRE, WI 54703 COMPANY# 082077 MICROBE GUARD INC. * DATA TYPES * 6901 EAST FISH LAKE ROAD, SUITE 132 EU AT EC FW EF OT MAPLE GROVE, MN 55369



Jeff Jones <jjones@delta-ac.com> 06/14/2006 02:55 PM To Tracy Lantz/DC/USEPA/US@EPA

cc 'Tom Higgins' <thigginsnbst@optonline.net>

bcc

Subject file symbol 83075-R; updated documents you requested

### Tracy:

Following up on our telephone conversation this afternoon attached please find revised formulator's exemption statement and EPA and public version of the end-use data matrix. As we discussed I have made the following changes:

Revised the active ingredient identified on the formulator's exemption statement to be consistent
with revised label submitted on/around June 1;

 Revised date of CSF on formulator's exemption statement to match accepted CSF dated 10 April 2006; and

 Revised EPA and public version of the data matrix to reflect submission of Enforcement Analytical Method as opposed to using cite-all method of data support.

If you have questions or need additional changes, I'm on standby. Thanks for handling these changes over the phone and electronically.

Best regards,

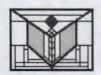
Jeff Jones Delta Analytical Corporation 301 680-7971 V 301 680-7975 F jjones@delta-ac.com



End use data matrix EPA file copy 14 June 2006.pdf 8570-27 Formulator's exemption signed.pdf



End use data matrix public file copy 14 June 2006.pdf



Tracy Lantz/DC/USEPA/US 06/12/2006 06:18 PM

Dennis Edwards/DC/USEPA/US, Michele Wingfield/DC/USEPA/US, Carlton Kempter/DC/USEPA/US, Nancy Whyte/DC/USEPA/US

CC

bcc

Fw: New Fabric Treatment Provides Protection From Subject Bacteria, Mold & Mildew

This company does not have any registered products. They will likely have a product registered later this week, but this product will not be allowed to make claims for: "long-term residual disinfecting action", "preventing cross contamination of these microbes and some viruses" or "effective against Staphylococcus aureus, MRSA, Salmonella, E. coli" In fact, no company has ever provided data to show that any of these claims can be made for this active ingredient.

Is someone following up with an ECR or is the information being forwarded to Brenda Mosley???

---- Forwarded by Tracy Lantz/DC/USEPA/US on 06/12/2006 06:21 PM ----



Dennis Edwards/DC/USEPA/US 06/08/2006 05:18 PM

To Tracy Lantz/DC/USEPA/US@EPA

Fw: New Fabric Treatment Provides Protection From Subject Bacteria, Mold & Mildew

Dennis Edwards Antimicrobials Division 703-308-8087 --- Forwarded by Dennis Edwards/DC/USEPA/US on 06/08/2006 05:17 PM -----



Kempter/DC/USEPA/US 06/01/2006 09:05 AM

To Michele Wingfield/DC/USEPA/US

cc Dennis Edwards/DC/USEPA/US@EPA

Subject

Re: Fw: New Fabric Treatment Provides Protection From Bacteria, Mold & Mildew

Michele/Dennis--If you find on PPIS that this product is not registered, you should forward the info to Brenda Mosley for possible action.

Jeff

Michele Wingfield/DC/USEPA/US



Michele Wingfield/DC/USEPA/US 06/01/2006 08:57 AM

Dennis Edwards/DC/USEPA/US@EPA, Carlton Kempter/DC/USEPA/US@EPA

Fw: New Fabric Treatment Provides Protection From Subject Bacteria, Mold & Mildew







(copy to my files)
To Michele Wingfield/DC/USEPA/US

Dennis Edwards/DC/USEPA/US@EPA

bcc

Re: Fw: New Fabric Treatment Provides Protection From Subject Bacteria, Mold & Mildew

Michele/Dennis--If you find on PPIS that this product is not registered, you should forward the info to Brenda Mosley for possible action.

Jeff

Michele Wingfield/DC/USEPA/US



Michele Wingfield/DC/USEPA/US 06/01/2006 08:57 AM

Dennis Edwards/DC/USEPA/US@EPA, Carlton To Kempter/DC/USEPA/US@EPA

CC

Fw: New Fabric Treatment Provides Protection From Subject Bacteria, Mold & Mildew

Dennis, I think this might be the same Tom Higgins that was involved with Bioshield. I'm pretty sure this product is not registered.

Michele

Michele E. Wingfield, Chief **Product Science Branch** Antimicrobials Division (7510P) Office of Pesticide Programs **Environmental Protection Agency** 1200 Pennsylvania Avenue N.W. Washington, D.C. 20640

Ph. 703-308-6349 Fax. 703-305-5620

----Forwarded by Michele Wingfield/DC/USEPA/US on 06/01/2006 08:51AM -----

To: wingfield.michele@epa.gov, Betty Shackleford/DC/USEPA/US@EPA

From: Nancy Whyte/DC/USEPA/US

Date: 05/31/2006 05:20PM

Subject: Fw: New Fabric Treatment Provides Protection From Bacteria, Mold & Mildew

Nancy Whyte, Acting Efficacy Team Leader US Environmental Protection Agency

Antimicrobial Division, Product Science Branch

Phone: 703-308-2012 Fax: 703-308-8481

----- Forwarded by Nancy Whyte/DC/USEPA/US on 05/31/2006 05:18 PM -----

william.mccor mick@clorox.

com

ToNancy Whyte/DC/USEPA/US@EPA

05/31/2006 12:04 PM

cc

SubjectFw: New Fabric Treatment Provides Protection From Bacteria, Mold & Mildew

Nancy: Are you aware of this? I am concerned that we have been laboring for months on our protocol and this is out there. Bill

Bill McCormick Clorox 7200 Johnson Dr. Pleasanton CA 94588 Phone (925) 425-6249 Fax (925) 425-4496

---- Forwarded by William McCormick/US-Corporate/Clorox on 05/31/2006 09:02 AM -----

Julie

Spagnoli/US-Corporate

/Clorox

 $To Maha\ El-Sayed/US-Corporate/Clorox @Clorox,\ Elias\ Shaheen/US-Corporate/Clorox @Clorox.\ Khalida and Shaheen/US-Corporate/Clorox &Clorox.\ Khalida and Shaheen/US-Corporate/Clorox &Clorox &Clorox.\ Khalida and Shaheen/US-Corporate/Clorox &Clorox &Cl$ 

ljaz/US-Corporate/Clorox@Clorox, William McCormick/US-Corporate/Clorox@Clorox

05/31/2006 07:27 AM

SubjectNew Fabric Treatment Provides Protection From Bacteria, Mold & Mildew

FYI - I couldn't find any additional info on internet about it.

Julie Spagnoli Executive Director, Regulatory Affairs Clorox Services Company (202) 742-6641

### New Fabric Treatment Provides Protection From Bacteria, Mold & Mildew

Tuesday, May 30, 2006

By: Furniture World Magazine

A breakthrough, patented technology recently introduced to market has been shown to provide textiles, including those for home furnishings, with a long-lasting, non-leaching shield against microbial contamination. This unique antimicrobial can be applied to any textile or existing furniture and it will dramatically reduce the presence of bacteria and fungi, such as mold and mildew, and those organisms which cause odor and staining, according to NBS Technology, LLC, of Locust Valley, New York, which owns an exclusive long-term global license for the technology.

The technology, which NBS is marketing under the trade name Goldshield?, is the world?s first water-stabilized antimicrobial formulation providing a long-term residual disinfecting action. Goldshield? is the first commercial application of technology developed at Emory University which received three U.S. and several International patents.

While NBS will be seeking to introduce its products to a wide array of industries, the company is placing special emphasis on the textile and home furnishing market, according to President/CEO Tom Higgins. ?There is significant opportunity for textile and furniture manufacturers to create products with enhanced value using this antimicrobial technology,? he said. ?For example, carpets, drapes, furniture fabrics, linens, beddings and towels could be developed with built-in, long-term protection against bacteria which causes odor and staining. Furthermore, it will mitigate the mold and mildew associated with textiles. From a commercial perspective, it will also be helpful in preventing cross contamination of these microbes and some viruses.?

Goldshield? formulas are easy to apply to textiles, either by padding or exhausting on to the material during the finishing stage of production. In addition, the formula can be sold as a spray to be applied to textile products as an after-market application. Once it dries, it becomes permanently affixed and begins its protective activities. There is no visible change in the fabric appearance or hand-feel. It is also not limited to interior design as it can be applied to out-door furniture, and umbrellas to prevent the growth of mold and algae fungi.

Based on a variety of testing, Goldshield? technology has been demonstrated to be a broad-spectrum algaecide, bactericide and fungicide; specifically, it has shown to be effective against Staphylococcus aureus, MRSA, Salmonella, E.coli and other hardy bacteria such as those which cause odor and staining of textiles. In the case of textiles, Goldshield? formulas have demonstrated continued effectiveness after 50 washings.

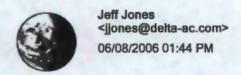
Goldshield? bonds covalently with virtually any organic and inorganic surfaces. Once bonded, it will not leach off or migrate, rendering the surfaces inhospitable to microbes for a long period of time. In addition, because it is aqueous-based - unlike other antimicrobial agents that modify surfaces? it is non-toxic, non-flammable and otherwise environmentally benign.

Another significant advantage of Goldshield? over conventional disinfectants and antimicrobials is that there is no known or anticipated risk for pathogens to genetically adapt.

?This technology represents a significant step forward,? Mr. Higgins said. ?It can revolutionize the approach to disinfection and the prevention of cross-contamination in numerous industrial sectors.?

NBS is seeking to develop relationships with users and distributors of its products worldwide. For more information, contact: NBS Technology email: enbst@optonline.net.

This e-mail (including any attachments) may contain information confidential to The Clorox Company and is intended only for the use of the intended recipient(s). If the reader of this message is not the intended recipient(s), you are notified that you have received this message in error and that any review, dissemination, distribution or copying of this message is strictly prohibited. If you have received this message in error, please delete this message and notify the sender immediately.



To Velma Noble/DC/USEPA/US@EPA

Tracy Lantz/DC/USEPA/US@EPA, 'Tom Higgins' <higginsnbst@optonline.net>

bcc

Subject RE: Goldshield 5; file symbol 83075-R

Thanks Velma, that's good news. I'll be in touch with Tracy.

When you stamp the label, I'd appreciate a fax to 301 680-7975 or phone call/email so we can pick up the label.

Thanks in advance.

Best regards,

Jeff jjones@delta-ac.com

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460



OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES **Antimicrobials Division** 

May 30, 2006

SUBJECT: PRODUCT CHEMISTRY REVIEW OF: Goldshield5

DP Barcode: TGAI\MUP

n

OR

Reg. No. Or File Symbol: 83075-R

End-use Product [X]

TO:

Velma Noble\Tracy Lantz

PM Team No. 31

FROM:

Chris Jiang, Chemist

**Product Science Branch** 

Antimicrobials Division (7510C)

THRU:

Karen P. Hicks, CTT Team Leader

Product Science Branch

Antimicrobials Division (7510C)

THRU:

Michele Wingfield, Branch Chief

Product Science Branch

Antimicrobials Division (7510C)

C) for KPH 5/30/06

Product Formulation for Goldsheild5 from label

Active Ingredient(s)

% by wt.

3-(trimethoxysilyl) propyl dimethyl octadecyl ammonium chloride

5.0 %

### **BACKGROUND:**

The registrant has submitted a Confidential Statement of Formula, a label, and a response to the review done under D326126.

#### **FINDINGS:**

- 1. The concentration of the active ingredient on the Confidential Statement of Formula (CSF dated 10 April 2006) is consistent with the label declaration.
- 2. All ingredients are cleared for use in pesticidal formulation.
- 3. The enforcement analytical method (pinpunched 5/19/06) is acceptable.
- 4. The density is acceptable as the density is 8.32 lbs/gal.
- 5. The pH is acceptable as the pH is 5.0.
- 6. The tests for storage stability and corrosion characteristics are ongoing.
- 7. The viscosity is **acceptable**.
- 8. All the other requirements were reviewed and accepted under D326126.

### **RECOMMENDATIONS:**

1. Product Science Branch of Antimicrobials Division finds this submission in support of the registration of 83075-R to be acceptable.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460



OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES Antimicrobials Division

March 15, 2006

SUBJECT: PRODUCT CHEMISTRY REVIEW OF:
Goldshield5

DP I arcode: D326126 TGA I/MUP

OR

Reg. No. Or File Symbol: 83075-R

End-use Product [X]

TO: Veln a Noble\Tracy Lantz

PM Team No. 31

FROM: Chri Jiang, Chemist

Prod ict Science Branch

Anti nicrobials Division (7510C)

THRU: Kare 1 P. Hicks, CTT Team Leader

Product Science Branch

Anti: nicrobials Division (7510C)

THRU: Mich : le Wingfield, Branch Chief

Prod ict Science Branch

Antimicrobials Division (7510C)

Prod 1ct Formulation for Goldsheild5 from label

Active Ingredient(s)

% by wt.

Octs decylaminodimethyltrihydroxysilyl propyl ammonium chloride

5.0 %

#### BACKGROUND:

The registral t has submitted a product chemistry package in support of a new registration of a microbiostatic agent. The package contains a label, a Confidential Statement of Formula, and studies that have been ident fied by the Agency as MRID #'s 446731901 and 46718501.

#### FINDINGS:

- 1. The concent ation of the active ingredient on the Confidential Statement of Formula (CSF dated 12 Dec 2005) is inconsistent with the label declaration. The registrant must revise the CSF and/or label so that they match exactly.
- 2. The stabilizer in the formulation is not cleared for use in pesticidal formulations. The registrant must either substitute the uncleared inert with an already cleared inert or have the supplier send the complete compositional information of the uncleared ingredient to the Agency. The information must include the product same (which must exactly match the name on the CSF), manufacturer name/address and complete chemical composition including the chemical name, CAS Reg. No. and percentage by weight for each component of the mixture. This information must be typed on manufacturer's letterhead and accompanied by a signature.
- 3. The descriptions of the starting materials and the manufacturing\roduction\formulation process are acceptable, pencing clearance of the uncleared inert.
- 4. The discussion of the formation of impurities is acceptable.
- 5. The certified limits cannot be determined because of the uncleared inert. The registrant may wish to alter the formulation with other inerts and this would necessitate recalculation of the certified limits.
- 6. The enforcer tent analytical method is unacceptable. The data that was submitted address the manner in which total solid content is analyzed and does not address how the product is analyzed for the concentration of the active ingredient.
- 7. The color, pl ysical state, and odor are acceptable as the product is a pale yellow to off-white liquid which is odor ess to slight alcohol.
- 8. The density is unacceptable. The CSF states that the density 8.34 lbs/gal, but the unsigned self-certification gives a value of 8.32 lbs/gal. This test must also be conducted under GLP comptance.
- 9. The pH is ur acceptable because the test was not conducted under GLP compliance.
- 10. The oxidatio 1/reduction potential is acceptable as the product contains neither oxidizing nor reducing agents.

- 11. The flammal ility is acceptable as the product is non-flammable.
- 12. The explodability is acceptable as the product does not contain potentially explosive materials.
- 13. The tests for storage stability and corrosion characteristics are ongoing. They must be conducted under GLP compliance.
- 14. The viscosity is unacceptable because the test was not conducted under GLP compliance.
- 15. The miscibil ty is acceptable as the product is dispersible in water.
- 16. The dielectri: breakdown voltage is acceptable as the product will not be used around electrical equipment.

### **RECOMMENDATIONS:**

1. Product Science Branch of Antimicrobials Division finds this submission in support of the registration of 8307: -R to be unacceptable for the reasons stated in the findings. The registrant must remedy the problem: stated in the findings before registration can proceed.



### **MEMORANDUM**

DATE: 5/18/06

TO: Velma Regulatory Manager

FROM: Information Services Branch, IRSD

Your receipt of this data submission is not an indication that MRIDs for the enclosed studies have been posted in OPPIN.

We expect that it will be approximately 5 days from the above date before the study-level data is available in OPPIN.

If you have any questions about this process, please contact Maureen Sherrill (305-5361) or Teresa Downs (305-5363).

This is a: fully accepted submission

partially accepted submission

□ rejected submission



### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

May 16, 2006

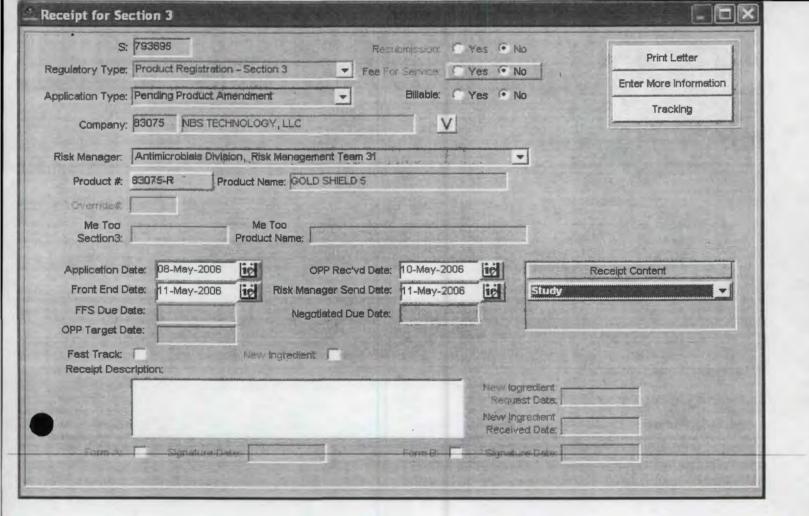
OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

DELTA ANALYTICAL CORP NBS TECHNOLOGY, LLC 7910 WOODMONT AVE., SUITE 1000 BETHESDA, MD 20814-

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 10-MAY-06. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.





Document Processing Desk (RESUB) Attn: Velma Noble Office of Pesticide Programs Environmental Protection Agency Washington, DC 20460

re: Supporting Data in Response to Product Chemistry Review dated March 15, 2006

and Agency Letter dated April 12, 2006

Product:

Gold Shield 5

Company:

NBS Technology, LLC

**EPA #:** 

83075-R

#### Dear Velma:

Enclosed please find the following documents resubmitted to address finding #6 in the product chemistry review dated March 15, 2006. The data submitted herein is a proposed enforcement analytical method applicable to the active ingredient in NBS Technology's product. In my earlier resubmission dated April 11, 2006, I had proposed to adopt the cite-all method of data support which was rejected in your letter of April 12, 2006.

- Application for Pesticide Registration (EPA Form 8570-1);
- Data cover letter and supporting data

It is my understanding that the Agency will need approximately 45 days to complete its review of the pending application. If that is not correct, please contact me immediately.

If you have any questions regarding this submission, please contact me at your convenience at <u>jiones@delta-ac.com</u>. Thanks for your consideration.

Sincerely,

Jeff Jones, Agent



Document Processing Desk (RESUB) Office of Pesticide Programs US Environmental Protection Agency Washington, DC 20460

re:

Supporting Data in Response to Product Chemistry Review dated March 15, 2006

and Agency Letter dated April 12, 2006

Product:

Gold Shield 5

Company:

NBS Technology, LLC

**EPA** #:

83075-R

Dear Sir or Madam:

Enclosed please find the following data submitted in support of registration of Gold Shield 5:

Volume 1 of 1

46825101

Enforcement Analytical Method: Gold Shield 5

Product Chemistry Series 62

MRID#

If you have any questions regarding this submission, please contact me as soon as possible at <u>ijones@delta-ac.com</u> or (301) 652-5495.

Sincerely,

Jeff Jones, Agent



Jeff Jones <jjones@delta-ac.com> 05/09/2006 12:01 PM To Velma Noble/DC/USEPA/US@EPA, Tracy Lantz/DC/USEPA/US@EPA

Dennis Edwards/DC/USEPA/US@EPA, "Tom Higgins"

<thigginsnbst@optonline.net>

bcc

Subject file symbol 83075-R; submission of enforcement analytical

I am attaching copies of a cover letter and proposed enforcement analytical method for Goldshield 5 (EPA File Symbol 83075-R). The full submission should be delivered to the mailroom by FedEx this morning.

If you recall, you are hoping to complete action on this application on this application in 45 days. Please confirm that that turn-around time will be possible.

Best regards,

Jeff Jones Delta Analytical Corporation 301 652 5495 V 301 652 5408 F jjones@delta-ac.com

cover letter.pdf enforcment analytical method study.pdf

Sent into review on 5/9/06
Will give Keven ~ 45 days
(~ June 23)

and allow me until mid July as per Deanis

will be in system as 172



Document Processing Desk (RESUB)
Attn: Velma Noble
Office of Pesticide Programs
Environmental Protection Agency
Washington, DC 20460

re: Supporting Data in Response to Product Chemistry Review dated March 15, 2006

and Agency Letter dated April 12, 2006

Product: Gold Shield 5

Company: NBS Technology, LLC

EPA #: 83075-R

#### Dear Velma:

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Sincerely,

Jeff Jones, Agent



Document Processing Desk (RESUB) Attn: Velma Noble Office of Pesticide Programs Environmental Protection Agency Washington, DC 20460

re: Supporting Data in Response to Product Chemistry Review dated March 15, 2006

and Agency Letter dated April 12, 2006

Product:

Gold Shield 5

Company:

NBS Technology, LLC

**EPA** #:

83075-R

#### Dear Velma:

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Sincerely,

Jeff Jones, Agent



Document Processing Desk (RESUB) Office of Pesticide Programs US Environmental Protection Agency Washington, DC 20460

re:

Supporting Data in Response to Product Chemistry Review dated March 15, 2006

and Agency Letter dated April 12, 2006

**Product:** 

Gold Shield 5

Company:

NBS Technology, LLC

**EPA** #:

83075-R

Dear Sir or Madam:

Enclosed please find the following data submitted in support of registration of Gold Shield 5:

Volume  $\underline{1}$  of  $\underline{1}$ 

46825101

Enforcement Analytical Method: Gold Shield 5

Product Chemistry Series 62

MRID#

If you have any questions regarding this submission, please contact me as soon as possible at <u>jjones@delta-ac.com</u> or (301) 652-5495.

Sincerely,

Jeff Jones, Agent

Please read instructions on				rorm Ag		1		OPP Identifier Number	
SEPA	United States Environmental Protection Agency Washington, DC 20460				Amendment Other				
***************************************		Application	for Pest	icide - Sec	tion				
1. Company/Product Number		тършовног		PA Product Ma			3. P	roposed Classification	
83075-R				ma Noble			T	None Restricte	
4. Company/Product (Name) Gold Shield 5			РМ: 31	PM# 31					
5. Name and Address of Ap NBS Technology, LLC c/o Delta Analytical Cor 7910 Woodmont Ave., Bethesda_MD 20814 Check if thi	p.	ode)	(b)(i to: EP	), my product A Reg. No.	is sim	nilar or identi	cal in co	n FIFRA Section 3(c)(3) omposition and labeling	
Commenced			Section						
Notification - Explain Explanation: Use additio Response to product chemis	nal page(s) if necessar						@delta-a	ic.com;	
			Section	- 10					
1. Material This Product Wi	il Be Packaged in:								
Child-Resistant Packaging  Yes  No	Unit Packaging  Yes  No		Water Solub Yes No	le Packeging		2. Type of (	Metal Plastic Glass	r	
* Certification must be submitted	If "Yes" Unit Packaging wgt	No. per container	If "Yes" Package wg	No. per contain			Paper Other (	Specify)	
tebel	Information Container	4. Size(s) Retail 2,4,8,16	Container ,20,22,36 oz	./1,5 gal.	5. Lo	container		ions	
6. Manner in Which Label is	Affixed to Product	Lithogra Paper gl Stencile	ph ued d	Oth	er				
			Section						
1. Contact Point (Complete	items directly below	for identification	of individual	to be contacted	, if nec	essary, to pro	cess this	s application d	
Name Jeff Jones			itle Agent,					ne No. (Include Area Code 2 5495	
	ements I have made or ny knowlinglly false or law.		attachment					6. Date Application Received • (Stamped)	
2. Signature	pres		Title Agent,			•	• • • •	••••	

5. Date 8 May 2006

EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete.

4. Typed Name Jeff Jones

White - EPA File Copy (original)

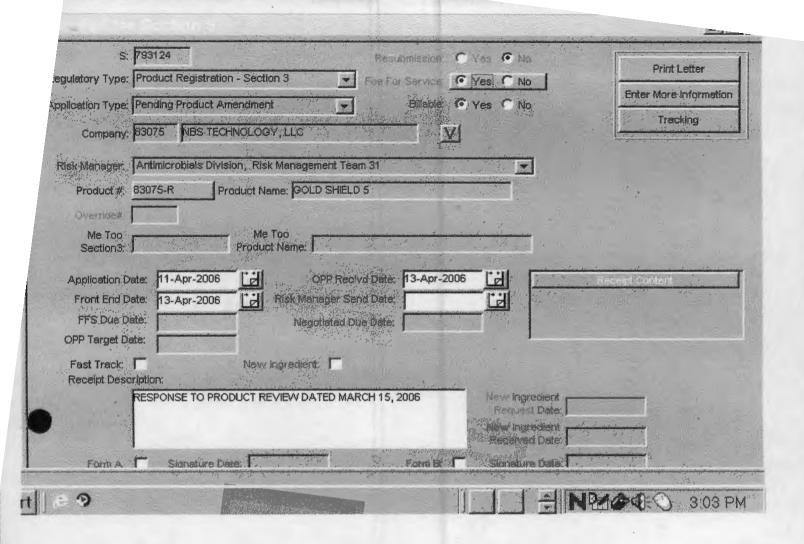
Yellow - Applicant Copy

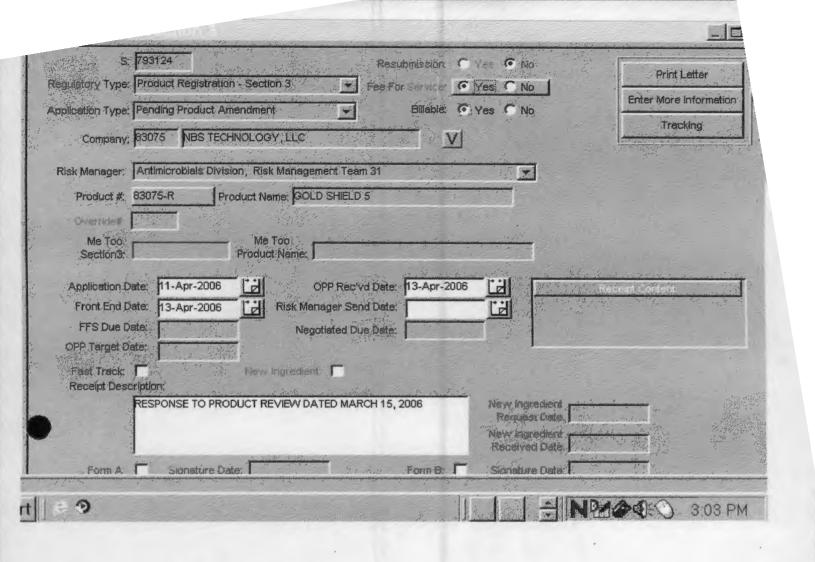
Please read instructions on n	everse before comple	ting form.		Form Appr	oved. Ol	MB No. 2070	-0060		
United States Environmental Protecti Washington, DC 20		Protection			A	Registration Amendment Other			
		Application	n for Pestic	ide - Sect	tion I				
. Company/Product Number			2. EPA	Product Man	ager		3. Pr	oposed Classification	
4. Company/Product (Name)			PM#					None Restricted	
5. Name and Address of App		ode)	(b)(i), to: EPA	my product i	s simila			FIFRA Section 3(c)(3) mposition and labeling	
Check if this	is a new address			uct Name					
			Section -	11					
Amendment - Explain  Resubmission in resp  Notification - Explain	onse to Agency letter	dated		Final printed Agency lett "Me Too" A Other - Exp	er dated Application				
	-		Section -	111					
1. Material This Product Will	Be Packaged In:								
Child-Resistant Packaging Yes* No	Unit Packaging Yes No		Water Soluble Yes No	Packaging	2	P	fetal lastic		
* Certification must be submitted	If "Yes" Unit Packaging wgt	No. per container	If "Yes" Package wgt	No. per containe	,	P	aper other (1	Specify)	
Label C	Information Container	4. Size(s) Reta	ail Container		5. Locat	ion of Label I On Label On Labeling		ons npanying product	
6. Manner in Which Label is	Affixed to Product	Lithogr Paper ( Stencil	aph glued ed	Othe					
			Section -	IV					
1. Contact Point <i> Complete</i> Name	items directly below		of individual to	be contacted,	if neces		lephon	e application.) ne No. (laciude Area Code	
i certify that the state I acknowledge that an both under applicable	y knowingly false or	Certificate this form and misleading state	all attachments t	hereto are truc nishable by fir	e, accura	ite and completisonment or	••.	6. Date Aβplication Received • (Stamped)	
2. Signeture			3. Title						

5. Date

4. Typed Name

175







### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

April 17, 2006

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

JEFF JONES
DELTA ANALYTICAL CORP
NBS TECHNOLOGY, LLC
7910 WOODMONT AVE., SUITE 1000
BETHESDA, MD 20814-

PRODUCT NAME: GOLD SHIELD 5

COMPANY NAME: NBS TECHNOLOGY, LLC OPP IDENTIFICATION NUMBER: 306430

EPA FILE SYMBOL: 83075-R EPA RECEIPT DATE: 04/13/06

SUBJECT: RECEIPT OF AMENDMENT

**DEAR REGISTRANT:** 

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Antimicrobials Division, Risk Management Team 31, at (703) 308-6233.

Sincerely,

A. Wries

Front End Processing Staff Information Services Branch

Information Technology & Resources Management Division



April 11, 2006

Document Processing Desk (APPL) Attn: Velma Noble Office of Pesticide Programs Environmental Protection Agency Washington, DC 20460

re: Gold Shield 5; EPA Symbol 83075-R; Response to Product Chemistry Review Dated March 15, 2006

Dear Velma:

Enclosed please find the following documents resubmitted in response to comments in a product chemistry review dated March 15, 2006:

- Summary of response to EPA comments
- Application for Pesticide Registration (EPA Form 8570-1);
- Confidential Statement of Formula (EPA Form 8570-4) (2 copies);
- Revised Data Matrix (EPA Form 8570-34);
- Proposed label (5 copies)

Recognizing that NBS Technology, LLC and I have taken approximately two weeks to respond to various requests for additional information and other issues, <u>I ask that the Agency extend the decision due date on this application from April 13 until April 27</u>.

If you have any questions regarding this submission, please contact me at your convenience at jjones@delta-ac.com. Thanks for your consideration.

Sincerely,

T. Jeffrey Jones, Agent

NBS Technologies, LLC

Please read instructions on	reverse before compl	eting form.		Form A	pproved	d. OMB No.	2070-006	O. Approval expires 2-28	
<b>\$EPA</b>	Environmenta	United States  Al Protectionington, DC 20			1	Registra Amend Other		OPP Identifier Number 306430	
		Applicati	on for Pes	ticide - Se	ction	I			
1. Company/Product Numb 83075-R	er			EPA Product Melma Noble	anager		3. Pi	roposed Classification	
4. Company/Product (Name) Gold Shield 5			1	PM# 31					
5. Name and Address of Ap NBS Technology, LLC c/o Delta Analytical Co 7910 Woodmont Ave., Bethesda MD 20814 Check if thi	rp.	iode)	(b) to: El	(i), my produc	75497	nilar or iden	tical in co	FIFRA Section 3(c)(3) emposition and labeling	
			Section						
Amendment - Explain Resubmission in resubmission - Explain Notification - Explain Explanation: Use addition Response to product chemise 27.	ponse to Agency lette n below. nal page(s) if necesse	ıry. (For section	on I and Section	Agency lo "Me Too" Other - E	etter dat Applic xplein b	ation.		date from April 13 to April	
1. Material This Product W	III Re Packaged in		Section	- 111	_				
Child-Resistant Packaging  Yes  No	Unit Packaging  Yes  No		Water Solu  Yes  ✓ No	ble Packaging		2. Type of	Container  Metal Plastic Glass		
* Certification must be submitted	If "Yes" Unit Packaging wg	No. per t. container	If "Yes" Package w	No. pe gt contair			Paper Other (S	Specify)	
ation of Net Contents	Information Container		tail Container  5. Location of Label Directions  16,20,22,36 oz./1,5 gal.			ons			
5. Manner in Which Label is	Affixed to Product	Litho Pape Sten	graph r glued ciled	Oth	her				
			Section	- IV					
1. Contact Point (Complete	items directly below	for identificati	ion of individual	to be contacted	d, if nec	essary, to pi	ocess this	application.)	
Name Jeff Jones			Title Agent,				Telephone No. (Include Area Code 301 652 5495 • •		
I certify that the state I acknowledge that a both under applicable	ny knowlinglly false o		d all attachmen					6. Date Application Received (Stamped)	
. Signature			3. Title Agent,						

5. Date

11 April 2006

4. Typed Name

Jeff Jones

**United States** 

### Environmental Protection Agency Washington, DC 20460

Form Approved. OMB No. 2070-0060 Registration **Amendment** 306430

**OPP Identifier Number** 

					Other		A STATE OF THE STATE OF T	
		Application	on for Pestio	cide - Section	n I			
Company/Product Number  4. Company/Product (Name)			2. EP/	A Product Manage	97	3. Pi	3. Proposed Classification	
			PM#			$\neg$ $\vdash$	None Restricted	
5. Name and Address of Ap	plicent ( <i>Include ZIP Co</i>	odej	(b)(i), to:		similar or ident	ical in co	FIFRA Section 3(c)(3) omposition and labeling	
Check if this	is a new address		Proc	juct Name				
			Section -	- 11				
Resubmission in respondent - Explain  Notification - Explain  Explanation: Use addition	ponse to Agency letter		n I and Section II.	Agency letter "Me Too" App Other - Explain	olication.	• to		
Materiel This Product Wi Child-Resistant Packaging	Il Be Packaged In:		Section -		2. Type of	Containe	7	
Yes* No * Certification must be submitted	Yes No  If "Yes" Unit Packaging wgt	No. per	Yas No If "Yes" Package wgt	No. per container		Metal Plastic Glass Paper	Specify)	
Label Contents	Container	4. Size(s) Re			Location of Late On Labe		ons mpanying product	
		Lithog Paper Stenc						
			Section -					
1. Contact Point <i>(Complete</i> Name	items directly below	for identification	on of individual to	be contacted, if	necessary, to pi		s application.) ne No. (Include Area Code)	
I certify that the state I acknowledge that a	ny knowingly felse or		all attachments				6. Date Application Received (Stamped)	
2. Signature			3. Title					
4. Typed Name			5. Date				181	



Dennis Edwards/DC/USEPA/US 04/24/2006 05:01 PM To Tracy Lantz/DC/USEPA/US@EPA

CC

bcc

Subject Fw: Symbol 83075-R; submission of enforcement analytical method

Dennis Edwards
Antimicrobials Division
703-308-8087
—— Forwarded by Dennis Edwards/DC/USEPA/US on 04/24/2006 04:59 PM ——



Jeff Jones <jjones@delta-ac.com> 04/24/2006 04:52 PM

To Velma Noble/DC/USEPA/US@EPA, Dennis

Edwards/DC/USEPA/US@EPA

"Tom Higgins" <thigginsnbst@optonline.net>, "Ted Shlisky"

<mdvdt@aol.com>

Symbol 83075-R; submission of enforcement analytical method

Subject

I am writing to say we've encountered a slight delay in getting the revised method submitted.

We've needed assistance from several consulting university chemists (including the Emory University patent-holder) who had other projects demanding attention. We are working hard to get the submission into the mailroom this week.

Thanks for your patience.

Best regards,

Jeff Jones Delta Analytical Corporation 301 652 5495 V 301 652 5408 F ijones@delta-ac.com

NBS technology TO PRIA Fee for Service D 363320 meetings 83075-R 5 788195 110 06 Gold Shield 5 rec'd by T. Lantz 1/6/00 \$ 1050 fee paid? appl. cation for pesticide No 46 Received: Formulator's exemption A 53 Paid 1/13/00 went cite all for the toxicityasked for waiver for dermal sensitization cited BioShield for eye as 2 volumes chemistry deta reviewer has labels product specific data matrix 1/24/06 Troubles supposed to receive lote. > rerights to discussed of after 3/16/06 Register" me too product of 754 97-1 The inext deargest renegotiation alls Incorrect company # on draft label told them on 1/27/06 Do we send dernal sens waiver for review? 1/9/06 Howenot record chemistry data to put into review tell company Labol language appears to agree of BioShield products worker is not acceptable charge to cite all for derival Received data on 1/24/06 (nemistry data sero for review on 1/27/06 check vs. Bioshidd - will primary eye tox support? Tentame starts 1/13/06 Tentative Due: 4/13/06 think 50 Schole western of 90 days says Tan He is ne-tooing 75497-1 WHO 15 Not the same as per csf-car he really use one 183 4 Tan 3/22/00 we will all to support do a lefter correct in 10 days or do not graits

3/28/00 Received new chemistry review from Chris. Inert issue address but other issues remain.
3/30/00 Dennis Edwards+ Tray Lasts

Called Jeff on this day.

Told him in the future that we

Told him in the future that we will not take a ESF rereview after the data Chris and should not take some thing late without going thru the regulatory team

Identified items #6,8,9,13,14
which Med to be addressed.
We will not register conditionally based on data gaps.

Requiring GLP or an explanation is something we should have done all along.

4/4/06 Receive email via Michael which may address additional chemistry issues. Showed this information to Karen Aichs - she said chemistry will need 60 days. - plus allow some time for me at end. Chemistry needs a Bean - last data package of CSF, last

4/5/06 Velna and Dennis called Jeff Jones to attempt a renegotiation.

4/6/06 contenence call of Velva, Michael, Karen H., 1994 + Jeff Jones
Jeff Jones would not agree to 45 day extension
Fronk said prepare a do not grant letter.
Attache first review faxed and history.

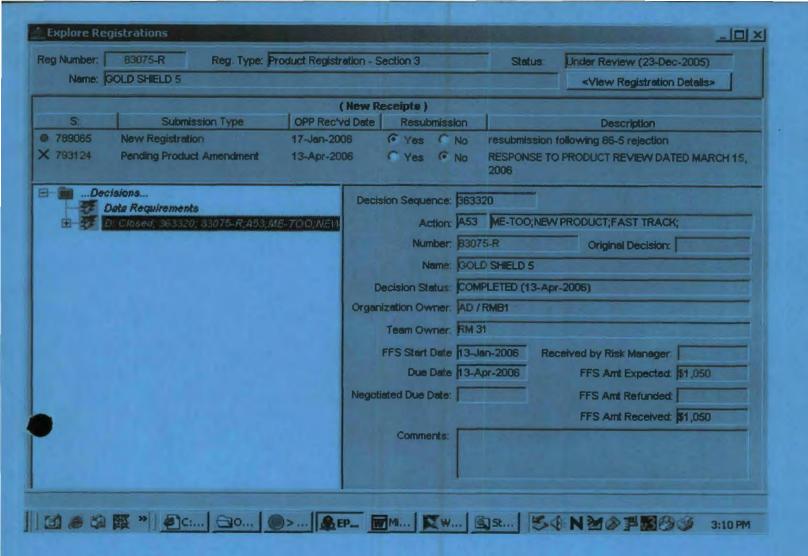
4/6/06 Frank said I should draft a do not grant letter for this product.

I will do this on 4/10/06 and send to Michael the same afternoon.

Michael Says I should reference 160.12 (b) and 160.17 (authority to reject). Try to get language from Karen H. + OGC about chemistry deficiently.

4/13/06 called Jeff Jones - we are faxing a to Not Grass Letter to you.
301 652 5408

184



TRANSMISSION OK

TX/RX NO

3885

CONNECTION TEL

913016525408

SUBADDRESS

CONNECTION ID

Delta

ST. TIME

04/13 14:59

USAGE T

03'04

PGS.

8

RESULT

OK

### United States Environmental Protection Agency

Washington, D.C. 20460



## Office of Prevention, Pesticides and Toxic Substances Office of Pesticide Programs

**Antimicrobial Division** 

FAX NUMBER (703)308-8481

### FACSIMILE REQUEST/COVER SHEET

(Please type or print clearly in black ink only)

### **SEND FAX TO:**

Name:	Jeff Jones	
Office:		_
FAX phone No	301 652 5408	_
Office Phon :		
From:		
Name:	Tracy Lantz	
Division/Brs nch:	O AD	
Office Phon: No:	703 308 6415	
Mail Code: 15100	Date: 4 13 00 Time: 3:00PM	
Number of 1 ages (with th	is cover sheet):	
Special Mes age:	Do Not Good Later Autor 4/12/06	18

## United States Environmental Protection Agency Washington, D.C. 20460



## Office of Prevention, Pesticides and Toxic Substances Office of Pesticide Programs

Antimicrobial Division
FAX NUMBER (703 )308-8481

### FACSIMILE REQUEST/COVER SHEET

(Please type or print clearly in black ink only)

SEND FAX TO:	
Name:	Jeff Jones
Office:	20200 (1.1902807/14678)
FAX phone No.	301 652 5408
Office Phone.	
From:	
Name:	Tracy Lantz
Division/Branch:	A
Office Phone No:	703 308 6415
Mail Code: 15icc	Date: 4 13 00 Time: 3:00PM
Number of pages (with t	his cover sheet):
Special Message:	MATERIAL PROPERTY OF THE PROPE
	Do Not Grant Letter dated 4/12/06
	Chemistry Review of 3/15/06  Email of 3/14/06 3:49 PM
	Email of 3/14/66 3:49 PM
1852	

ROUTING AND TRAN	SMITTAL SLIP	04/12/2006	
O: (Name, office symbol, room numb	er, building, Agency/Post)	Initials	Date
Betty Shackleford		615	4/12/06
Marty Monell - ケルP	DD'S FIRST!	HIS ONE MILL	4/12/06
Jim Jones	D 2 6.622	421	4/17
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5.			
5.			
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0.			
Action	File	Note and Return	
Approval	For Clearance	Per Conversation	
As Requested	For Correction	Prepare Reply	
Circulate	For Your Information	See Me	<u>.</u>
Comment	Investigate	Signature	
Coordination	Justify	Other	
ROM: (Name, org. symbol, Agency/F Michael Hardy	Post)	Room No Bldg.	Rm. 308L
•	Environmental Protection Agency		

### Remarks:

Request for Not Grant Determination

OF 41 (Rev. 7-76) (E~Forms 4.4) Prescribed by GSA FPMR (41 CFR) 101-11.206

# FEE FOR SERVICE



### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

April 12, 2006

Jeff Jones Consultant for NBS Technology, LLC c/o Delta Analytical Corp. 7910 Woodmont Ave., Suite 1000 Bethesda, MD 20814

RE: Application for Registration dated: December 20, 2005

Product Name: Gold Shield 5 EPA File Symbol: 83075-R PRIA Fee Category: A53

Dear Mr. Jones:

Our records indicate that the decision review period for EPA to make a determination pursuant to the Pesticide Registration Improvement Act (PRIA) regarding the above referenced application ends on April 13, 2006. The Agency has reviewed the application. On March 14, 2006, the Agency first informed you (via e-mail) that the application was unacceptable and initiated a discussion of the deficiencies that needed to be resolved. On March 15, 2006, the Agency sent you the completed Product Chemistry review, which described all of the outstanding chemistry deficiencies. The Agency has continued to communicate with you regarding these deficiencies, including phone calls on March 15th, 16th, 30th, April 5th and 6th. During this time only one of the chemistry deficiencies concerning an inert in your product formulation has been addressed by replacing the inert with a previously cleared inert. In addition, you have been informed that if you submit new, acceptable chemistry data to address the remaining deficiencies, the Agency will need a minimum of 45 days to review the additional data and complete the processing of this application. Nonetheless, you have only requested an extension of 14 days beyond the existing PRIA review period. Again, the Agency does not believe this is sufficient time to adequately review the data and process your application in light of the deficiencies outlined in the March 15, 2006 letter. Thus, the Agency, in meeting its obligation to make a determination within the PRIA decision review period and based upon the information currently before it, has determined that your application does not meet the standard for registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) and, therefore, cannot be granted at this time.

To reiterate in summary fashion, the application's deficiencies include:

- 1) The enforcement analytical method is unacceptable. Additionally, your request, dated April 10, 2006, to utilize the "cite-all" method of support for the enforcement analytical method is unacceptable.
- 2) The density is unacceptable.
- 3) The following studies were not conducted under Good Laboratory Practice Standards: density, pH, and viscosity. As you know, pursuant to 40 CFR Part 160.12 (b), if such studies are not conducted in accordance with GLP, then such studies require "[a] statement describing in detail all the differences between the practices used in the study and those required by this part". Such statements have not been provided to the Agency. According to 40 CFR Part 160.17 (a) "EPA may refuse to consider reliable for purposes of supporting an application for a research or marketing permit any data from a study which was not conducted in accordance with this part."
- 4) The concentration of the active ingredient on the Confidential Statement of Formula is inconsistent with the label declaration.

These deficiencies were originally conveyed to you on March 15, 2006. For your convenience and reference, enclosed is a copy of the March 15, 2006 review.

Although this concludes EPA's PRIA review of your application, this determination is not a denial of your application pursuant to section 3(c)(6) of FIFRA. Pursuant to 40 CFR § 152.105, you have 75 days, June 26, 2006, to address the deficiencies or notify the Agency when the information will be submitted to address the deficiencies. You have the following four options.

- 1. Resolve the issue(s). You may resolve the issue(s) identified in the Product Chemistry review dated March 15, 2006 and received by you the same day by submitting the information/data/studies by June 26, 2006 or an explanation of why it will take longer to correct the deficiencies, including your written commitment and schedule to respond to the deficiencies. The Agency will then continue to diligently work with you in resolving the deficiencies without a PRIA decision due date. Absent unanticipated issues raised by your response to the issues in the deficiency letter, it is the Agency's expectation that resolution of the deficiencies will result in the granting of your application.
- 2. **Do nothing**. If you do not respond to this letter, the Agency will administratively withdraw your application on or after June 26, 2006. If a fee was paid, the Agency will provide any appropriate refund as soon as practicable. Once the application is withdrawn, if you decide to pursue this action again, you will need to submit a new application, including either the appropriate fee or request for a fee waiver (or both, if the fee waiver request is for a 50% fee waiver).
- 3. Withdraw the application. You may withdraw your application. If a fee was paid, the

Agency will provide any appropriate refund as soon as practicable. Once the application is withdrawn, if you decide to pursue this action again, you will need to submit a new application, including either the appropriate fee or request for a fee waiver (or both, if the fee waiver request is for a 50% fee waiver).

4. Request a denial. Because this determination is not a denial under section 3(c)(6) of FIFRA, you may request that EPA issue such a denial by responding to the Agency prior to June 26, 2006. The Agency will then initiate its denial process, based upon the record before the Agency as of the date of this letter, as described in section 3(c)(6) of FIFRA and 40 CFR § 152.118. The process includes publication of a notice of denial in the Federal Register and a possible public hearing.

If you have questions concerning or a response to this letter, please contact Dennis Edwards, Branch Chief, Regulatory Management Branch I, Antimicrobials Division by telephone, (703) 308-8087, or by e-mail at Edwards.dennis@epa.gov.

Sincerely,

James J. Jones, Director Office of Pesticide Programs

**Enclosures** 

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460



OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES Antimicrobials Division

March 15, 2006

SUBJECT: PRODUCT CHEMISTRY REVIEW OF: Goldshield5

DP Barcode: D326126

OR

П

Reg. No. Or File Symbol: 83075-R

End-use Product [X]

TO:

Velma Noble\Tracy Lantz

PM Team No. 31

TGAI\MUP

FROM:

Chris Jiang, Chemist

Product Science Branch

Antimicrobials Division (7510C)

THRU:

Karen P. Hicks, CTT Team Leader

Product Science Branch

Antimicrobials Division (7510C)

THRU:

Michele Wingfield, Branch Chief

Product-Science Branch

Antimicrobials Division (7510C)

Product-Formulation for Goldsheild5 from label

Active Ingredient(s)

% by wt.

5.0 %

Octadecylaminodimethyltrihydroxysilyl propyl ammonium chloride

#### **BACKGROUND:**

The registrant has submitted a product chemistry package in support of a new registration of a microbiostatic agent. The package contains a label, a Confidential Statement of Formula, and studies that have been identified by the Agency as MRID #'s 446731901 and 46718501.

#### **FINDINGS:**

- 1. The concentration of the active ingredient on the Confidential Statement of Formula (CSF dated 12 Dec 2005) is inconsistent with the label declaration. The registrant must revise the CSF and/or label so that they match exactly.
- 2. The stabilizer in the formulation is not cleared for use in pesticidal formulations. The registrant must either substitute the uncleared inert with an already cleared inert or have the supplier send the complete compositional information of the uncleared ingredient to the Agency. The information must include the product name (which must exactly match the name on the CSF), manufacturer name/address and complete chemical composition including the chemical name, CAS Reg. No. and percentage by weight for each component of the mixture. This information must be typed on manufacturer's letterhead and accompanied by a signature.
- 3. The descriptions of the starting materials and the manufacturing\production\formulation process are acceptable, pending clearance of the uncleared inert.
- 4. The discussion of the formation of impurities is acceptable.
- 5. The certified limits cannot be determined because of the uncleared inert. The registrant may wish to alter the formulation with other inerts and this would necessitate recalculation of the certified limits.
- 6. The enforcement analytical method is **unacceptable**. The data that was submitted address the manner in which total solid content is analyzed and does not address how the product is analyzed for the concentration of the active ingredient.
- 7. The color, physical state, and odor are acceptable as the product is a pale yellow to off-white liquid which is odorless to slight alcohol.
- 8. The density is unacceptable. The CSF states that the density 8.34 lbs/gal, but the unsigned self-certification gives a value of 8.32 lbs/gal. This test must also be conducted under GLP compliance.
- 9. The pH is unacceptable because the test was not conducted under GLP compliance.
- 10. The oxidation/reduction potential is acceptable as the product contains neither oxidizing nor reducing agents.

- 11. The flammability is acceptable as the product is non-flammable.
- 12. The explodability is acceptable as the product does not contain potentially explosive materials.
- 13. The tests for storage stability and corrosion characteristics are ongoing. They must be conducted under GLP compliance.
- 14. The viscosity is unacceptable because the test was not conducted under GLP compliance.
- 15. The miscibility is acceptable as the product is dispersible in water.
- 16. The dielectric breakdown voltage is acceptable as the product will not be used around electrical equipment.

#### **RECOMMENDATIONS:**

1. Product Science Branch of Antimicrobials Division finds this submission in support of the registration of 83075-R to be unacceptable for the reasons stated in the findings. The registrant must remedy the problems stated in the findings before registration can proceed.



Tracy Lantz/DC/USEPA/US 03/14/2006 03:49 PM

To jjones@delta-ac.com

cc Velma Noble/DC/USEPA/US (Dennis, Michael)

bcc

Subject Submission for Gold Shield 5 83075-R

Dear Mr. T. Jeffrey Jones,

We are still in the process of doing the initial assessment of the information submitted in support of this application. At this point we have identified a concern that can not be quickly resolved. There is an inert ingredient in this product which has not be approved for use in pesticides. As such we will require additional information on this ingredient and then that information will be sent to review for approval as an inert for pesticides. At this point there is not enough review time left to resolve this issue.

We need to start the renegotiation process. The Agency will require an additional 90 days after receipt of this information to complete the review. It is suggested that you send me a letter/e-mail with your proposed new due date. It is suggested that you allow the Agency an additional 90 days beyond the current due date of 4/13/06. There may be additional chemistry concerns identified by the end of this week. As soon as I am made aware of any other concerns, I will be in touch with you.

Thanks, Tracy Lantz 703 308 6415



#### Goldshield5TM

## MICROBIOSTATIC AGENT A Silicone Quaternary Ammonium Salt

TOTAL:

100.0%

KEEP OUT OF REACH OF CHILDREN

EPA Reg. No. 082766-XX

## **WARNING**

**EPA EST. xxxxx-NY-xx** 

NET CONTENTS: 2, 4, 8, 16, 20, 22, or 36 fluid oz.; 1, 5, 55, 150, or 275 gal.

Lot No.

#### **FIRST AID**

Have the product container or label with you when calling the poison control center or doctor, or going for treatment.

#### IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
- Call poison control center or doctor for treatment advice.

#### IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.
- Call a poison control center or doctor for further treatment advice.

#### IF ON SKIN:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

#### IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

A microbiostatic agent is an agent that inhibits the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae. This product does not protect users or others against food-borne or disease-causing bacteria.

# PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING. Causes substantial but temporary eye injury. Harmful if absorbed through skin or inhaled. Do not get in eyes. Avoid contact with skin and avoid breathing vapor. Wear protective eyewear (goggles or face shield). Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

#### **ENVIRONMENTAL HAZARDS**

Commercial and industrial uses: This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

De-activation may be required during clean up if a spill occurs. De-activation of *GOLDSHIELD* 5[™] can be achieved by the addition of anionic surfactant (such as soap, sulfonates, sulfates) in quantity equivalent to that of *GOLDSHIELD* 5[™].

Homeowner use: This pesticide is toxic to fish. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of pesticide.

# DIRECTIONS FOR USE Approved commercial and Industrial Applications

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Wear protective eyewear (goggles or face shield) and gloves when using this product. Dry treated areas and articles such as clothing before use. Remove children and pets from treated area until completely dry.

Prepare solutions by simply adding GOLDSHIELD 5[™]to solvent and stirring. Dilute GOLDSHIELD 5[™]by adding 0.2 to 2 fluid ounces of GOLDSHIELD 5[™]per gallon) of water or other solvents (for example, alcohol and ketones) and then applied to organic or inorganic substrates by brushing, dipping, padding, soaking, spraying, fogging or by using foam finishing techniques to give a final treatment of 0.1 to 1.0 percent by weight active ingredient.

Dry substrates at temperatures from ambient to a maximum of 160° C (320° F) to effect complete condensation of silanol groups and to remove water, solvents and/or traces of methanol from hydrolysis. Optimum application and drying conditions, such as time

#### PAGE 3 - MASTER LABEL FOR GOLDSHIELD 5™

and temperature, should be determined for each application before use. If necessary, reapply *GOLDSHIELD* 5™ every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.

GOLDSHIELD 5™ when used as a concrete additive is added directly during concrete preparation. Use 6 fluid ounces GOLDSHIELD 5™ per cubic feet of concrete. Add to water before addition of concrete. Addition of GOLDSHIELD 5™ reduces deterioration of sewer pipes and manholes by inhibiting microbiologically induced corrosion.

GOLDSHIELD 5[™]when used as an additive for paints and coatings is added directly during preparation of the paint or coating. Use 5 pounds of GOLDSHIELD 5[™]per 100 pounds of paint or coating (or 1 pound GOLDSHIELD 5[™]per 20 pounds paint/coating). The addition of the antimicrobial agent GOLDSHIELD 5[™] to paints at the point of manufacture preserves the paint in the can as well as the dried paint film. GOLDSHIELD 5[™] inhabits the growth of odor causing bacteria, bacteria which causes staining and discoloration, fungi (mold and mildew), and algae on the surface of dried films and coatings.

#### Approved commercial and industrial applications

The active ingredient in *GOLDSHIELD* 5™ is effective against odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae as a static agent. *GOLDSHIELD* 5™ can be used as a final bacteriostatic finish on the following items to impart bacteriostatic/fungistatic (mold and mildew) activity.

- Air filters for furnaces, air-conditioners, air purification devices, automobiles, recirculating air handling systems
- Air filters/materials
- Aquarium filter material
- Bed sheets, blankets, and bedspreads
- Buffer pads (abrasive and polishing)
- Carpets and draperies
- Cellulose sponges
- Concrete additive for sewer pipes, manholes and concrete sewer structures; not to be used in treatment of storm drains
- Concrete additive for repair and renewal of sewer pipes and manholes and concrete sewer structures; not to be used in treatment of storm drains
- Exterior walls (such as stone, concrete, brick)
- Fiberfill for upholstery, sleeping bags, apparel, where the fiber is cotton, natural down, nylon, polyester, rayon, or wool
- · Fiberglass ductboard
- Fire hose fabric
- Humidifier belts
- Mattress pads and ticking
- Mens underwear and outerwear

G:\nbs technology\NBST 05 application 14 Dec 2005\label.doc

#### PAGE 4 - MASTER LABEL FOR GOLDSHIELD 5TM

- Non-woven disposable diapers
- Non-woven polyester
- Outerwear apparel (jackets, sweaters, sweatshirts, coats, raincoats, overcoats, jerseys, ponchos)
- GOLDSHIELD 5[™] can be used in paints and coatings as an in can preservative for protection of paint film and coating film. Types of paints and coatings include: latex indoor/outdoor paints and stains, wood-stains, architectural paints, lacquer and maintenance coatings, films, laminates and finishes including alkyd, urethane, enamel, epoxy, siloxaline, amino resins, textile coatings, extrusion coatings, architectural coatings and overlays, anti-corrosion coatings, fire-resistant coatings, aliphatic coatings, vinyl-ester and polyester coatings, gel coatings, amino resins, resins used as additive mixes for cement, epoxy laminating resins, and blends and copolymers thereof;
- Polyurethane and cellulose foam for household, industrial, and institutional sponges and mops
- · Polyurethane and polyethylene foam, when covered
- Polyurethane foam for packaging and cushioning in non-food contact applications
- Polyurethane foam used as a growth medium for non-food crops and plants
- Pre-moistened towelettes and tissue wipes (these do not impart pesticidal properties)
- Roofing materials defined as shingles, roofing granules, wood shakes, felt, stone and synthetic overcoats
- Sand bags, tents, tarpaulins, sails, and ropes
- Athletic and casual shoes
- Shoe insoles
- Shower curtains
- Socks comprised of nylon, nylon/orlon, cotton/nylon, linen/Lycra, acrylic/polypropylene/nylon/Lycra, wool/silk/nylon/Lycra and wool/acrylic/nylon/Lycra
- Throw rugs
- Toweling made of 100 percent cotton, 100 percent polyester, and blends of the two fibers
- Toilet tank and seat covers
- Umbrellas
- Upholstery made of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefins, polypropylene, rayon, spandex, vinyl, wool
- Vacuum cleaner bags and filters
- Vinyl paper-wallpaper for non-food contact surfaces
- Disposable wiping cloths that can be used for multiple purposes such as dusting or washing furniture, cars, walls, windows, floors, appliances, dishes, counter tops; the wiping cloths do not impart pesticide properties
- Women's hosiery
- Women's intimate apparel

#### **DIRECTIONS FOR USE**

Approved commercial applications used in homes, offices, automobiles and institutions e.g., schools, hospitals, daycare centers, churches, correctional facilities

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Wear protective eyewear (goggles or face shield) and gloves when using this product. Dry treated areas and articles such as clothing before use. Remove children and pets from treated area until completely dry. Clean surfaces prior to application.

For Pump Spray Application: Dilute 8 ounces of GOLDSHIELD 5™ per gallon of water (2 oz. per quart; 1oz. per pint). Using pump sprayer, spray entire area 4"-6"s from the surface making sure the surface is completely covered. Apply and then let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test for staining and color-fastness of fabrics and carpets by treating and drying a small, concealed area prior to application.

GOLDSHIELD 5™ treats approximately 200 square feet per diluted gallon of water. When treating coarser substrates, more

GOLDSHIELD 5™treats approximately 200 square feet per diluted gallon of water. When treating coarser substrates, more GOLDSHIELD 5™T may be required due to absorption. A fan may be used to assist in drying carpeting.

For Commercial Spray Application: For commercial application equipment (i.e. carpet/upholstery steamers, rotary jet extraction cleaners, pressure sprayers) dilute 8 ounces of GOLDSHIELD 5™ per gallon of water (2 oz. per quart; 1oz. per pint); mix well. Apply and then let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test for staining and color-fastness of fabrics and carpets by treating and drying a small, concealed area prior to application. GOLDSHIELD 5™ treats approximately 200 square feet per diluted gallon of water. When treating coarser substrates, more GOLDSHIELD 5™ may be required due to absorption. Dry carpet areas and surfaces before re-entry and dry articles before use. A fan may be used to assist in drying carpeting.

For Dipping/Soaking Application: Use appropriate sized wash basin or tub for dipping/soaking the item you are treating. Use enough GOLDSHIELD 5™ solution to completely submerge item. Dilute 8 ounces of GOLDSHIELD 5™ per gallon of water (2 oz. per quart; 1oz. per pint); mix well. Completely submerge item in solution for 3 minutes. Remove item and dry. Test for staining and color-fastness of fabrics by treating and drying a small, concealed area prior to application. Do not reuse solution after dipping/soaking.

The substrate can be dried at room temperatures or at temperatures to a maximum of 160° C (320° F), for example in a clothes dryer. Remove excess liquid before attempting to dry in a clothes dryer. If necessary, reapply *GOLDSHIELD* 5[™] every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.

Approved commercial applications in homes, offices, automobiles and institutions e.g., schools, hospitals, day care centers, banks, churches, correctional facilities

The active ingredient in *GOLDSHIELD* 5[™] is effective against odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae as a static agent.

#### PAGE 6 - MASTER LABEL FOR GOLDSHIELD 5TM

GOLDSHIELD 5TMcan be used as a final bacteriostatic finish on the following items to impart bacteriostatic/fungistatic (mold and mildew) activity.

- Air filters for furnaces, air-conditioners, air purification devices, automobiles, recirculating air handling systems
- Air filters/materials
- Aguarium filter material
- · Bed sheets, blankets, and bedspreads
- Buffer pads (abrasive and polishing)
- Carpets and draperies
- Cellulose sponges
- Exterior walls(such as stone, concrete, brick)
- · Fiberfill for upholstery, sleeping bags, apparel, where the fiber is cotton, natural down, nylon, polyester, rayon, or wool
- Fiberglass ductboard
- Fire hose fabric
- Humidifier belts.
- Mattress pads and ticking
- Mens underwear and outerwear
- Non-woven polyester
- Outerwear apparel (jackets, sweaters, sweatshirts, coats, raincoats, overcoats, jerseys, ponchos)
- · Polyurethane and cellulose foam for household, industrial, and institutional sponges and mops
- Polyurethane and polyethylene foam, when covered
- Polyurethane foam for packaging and cushioning in non-food contact applications
- Polyurethane foam used as a growth medium for non-food crops and plants
- Roofing materials defined as shingles, roofing granules, wood shakes, felt, stone and synthetic overcoats
- Sand bags, tents, tarpaulins, sails, and ropes
- Athletic and casual shoes
- Shoe insoles
- Shower curtains
- Socks comprised of nylon, nylon/orlon, cotton/nylon, linen/Lycra, acrylic/polypropylene/nylon/Lycra, wool/silk/nylon/Lycra and wool/acrylic/nylon/Lycra
- Throw rugs
- Toweling made of 100 percent cotton, 100 percent polyester, and blends of the two fibers
- Toilet tank and seat covers.
- Umbrellas
- Upholstery made of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefins, polypropylene, rayon, spandex, vinyl, wool
- Vacuum cleaner bags and filters
- Vinyl paper-wallpaper for non-food contact surfaces
- Disposable wiping cloths that can be used for multiple purposes such as dusting or washing furniture, cars, walls, windows, floors, appliances, dishes, counter tops; the wiping cloths do not impart pesticide properties
- Women's hosiery
- Women's intimate apparel

# **DIRECTIONS FOR USE**For homeowner applications

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Wear protective eyewear (goggles or face shield) and gloves when using this product. Dry treated areas and articles such as clothing before use. Remove children and pets from treated area until completely dry. Clean surfaces prior to application.

### Approved homeowner uses

The active ingredient in *GOLDSHIELD* 5[™] is effective against odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae as a static agent. *GOLDSHIELD* 5[™] can be used as a final bacteriostatic finish

on the following items to impart bacteriostatic/fungistatic (mold and mildew) activity.

on the following items to impart bacteriost	Pest	Dilution	Method of Application
	controlled	Rate	
Bed-sheets, blankets, bedspreads, curtains, draperies (washable only), underwear, socks, intimate apparel, hosiery, throw rugs, toweling, toilet tank covers, shower curtains, shoe insoles, outerwear apparel (jackets, sweaters, sweatshirts, coats, raincoats, overcoats, jerseys, ponchos). GOLDSHIELD 5 TM can be applied to fabrics made of acetates, acrylics, cotton, fiberglass, linen, Lycra, nylon, orlon, polyester, polyethylene, polyolefins, polypropylene, rayon, silk, spandex, vinyl, and wool	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	8 oz./ gallon 2 oz./ quart 1 oz./pint	DIP/SOAK: Dilute GOLDSHIELD 5™ in water; mix well. Use appropriate sized wash basin or tub for dipping/soaking the item you are treating. Use enough GOLDSHIELD 5™ solution to completely submerge item. Keep item in solution for 3 minutes. Remove item and wring excess liquid. Drying may be attained by dripping dry or wringing excess liquid from treated item. For larger items (e.g., bedspreads, curtains, draperies), place in washing machine on spin cycle to aid in the removal of excess liquid. Test staining and color-fastness of fabric and carpets by treating and drying a small concealed area prior to application. Do not reuse solution after dipping/soaking. Dry treated articles before use. Substrates can be hang-dried at room temperature or at temperatures to a maximum of 160 °C (320 °F); (for example in a clothes dryer). If necessary, reapply GOLDSHIELD 5™ every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.  SPRAY: Dilute GOLDSHIELD 5™ in water; mix well. Clean surface prior to application. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4"-6" from the surface making sure the surface is completely covered. Let stand until dry or let stand 3 minutes and wipe dry with

	Pest controlled	Dilution Rate	cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test staining and color-fastness of fabric by treating and drying a small concealed area prior to application. If necessary, reapply <i>GOLDSHIELD</i> 5™ every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.  Method of Application
Air filters and air filter material for  Furnaces, air conditioners  Air purification systems  Automobiles  Recirculating air handling systems  Vacuum cleaner filters  Aquaniums	Odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae	8 oz./ gallon 2 oz./ quart 1 oz./pint	SPRAY: Dilute GOLDSHIELD 5™ in water; mix well. When treating filters, remove filter from the unit. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4"- 6" from the surface making sure the surface is completely covered. Apply and then let stand until dry. If necessary, reapply GOLDSHIELD 5™ every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.
	Pest controlled	Dilution Rate	Method of Application
Carpeting	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	8 oz./ gallon 2 oz./ quart 1 oz./pint	SPRAY: Dilute GOLDSHIELD 5™ in water; mix well. Apply to clean carpet surface. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4"- 6" from the surface making sure the surface is completely covered. For rotary jet extraction cleaners and carpet steamers, add the diluted GOLDSHIELD 5™ solution directly to the cleaning tank, then operate the equipment in accordance with manufacturer's instructions. Apply and then let stand until dry. Test staining and color-fastness of carpets by treating and drying a small concealed area prior to application. GOLDSHIELD 5™ treats approximately 200 square feet per diluted gallon of water. When treating coarser substrates (e.g., wool carpeting), more GOLDSHIELD 5™ may be required due to absorption. Dry carpet areas and surfaces before re-entry. A fan may be used to assist in drying carpeting. Remove children and pets from treated area until completely dried. If necessary, reapply GOLDSHIELD 5™ every three months or when odor, staining and discoloration due to bacteria, mold stains,



			and mildew stains return.
	(84)		and mildew stains return.
	Pest controlled	Dilution Rate	Method of Application
Mattress pad and mattress ticking and upholstery composed of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefins, polypropylene, rayon, spandex, vinyl, wool; fiberfill to be used in upholstery, sleeping bags, apparel, where the fiber is cotton, natural down, nylon, rayon or wool	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	8 oz./ gallon 2 oz./ quart 1 oz./pint	SPRAY: Dilute GOLDSHIELD 5™ in water; mix well. Clean surfaces prior to application. Using a trigger pump sprayer spray the entire surface area 4"- 6" from the surface making sure the surface is completely covered. Apply and then let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test staining and color-fastness of fabric by treating and drying a small concealed area prior to application. When applying to mattress pads and ticking do not soak. Remove children and pets from treated area until completely dried. If necessary, reapply GOLDSHIELD 5™ every three months or when odor, staining and discoloration due to bacteria, mold stains and mildew stains return.
	Pest controlled	Dilution Rate	Method of Application
Tents, tarpaulins, sails, ropes.	Odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae	8 oz./ gallon 2 oz./ quart 1 oz./pint	SPRAY: Dilute GOLDSHIELD 5™ in water; mix well. Clean surface prior to application. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4"-6" from the surface making sure the surface is completely covered. Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test staining and color-fastness of fabric by treating and drying a small concealed area prior to application. If necessary, reapply GOLDSHIELD 5™ every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.
			<b>DIP/SOAK:</b> Dilute <i>GOLDSHIELD</i> 5™in water and mix well. Use appropriate sized wash basin or tub for dipping/soaking the item you are treating. Use enough <i>GOLDSHIELD</i> 5™solution to completely submerge item.

		Dilution	Keep item in solution for three minutes. Remove item and wring excess liquid. Test staining and color-fastness of fabric by treating and drying a small concealed area prior to application. Do not reuse solution after dipping/soaking. Dry treated articles before use. Substrates can be hang-dried at room temperature or at temperatures to a maximum of 160 °C (320 °F); (for example in a clothes dryer). Remove excess liquid before attempting to dry in a clothes dryer. If necessary, reapply <i>GOLDSHIELD</i> 5™ every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.
	Pest controlled	Rate	Method of Application
Roofing materials (such as shingles, roofing granules, wood shakes, felt, stone, synthetic overcoats) Exterior walls (such as stone, concrete, brick)	Odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae	8 oz./ gallon 2 oz./ quart 1 oz./pint	SPRAY: Dilute GOLDSHIELD 5™ in water; mix well. Make sure the roof or wall is clean prior to application. Using a pressure sprayer, spray the entire surface area 6"-12" from the surface making sure the surface is completely covered. After applying the dilute solution of GOLDSHIELD 5™let stand until dry. GOLDSHIELD 5™treats approximately 200 square feet of roofing or wall per diluted gallon of water. If necessary, reapply GOLDSHIELD 5™every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.
	Pest	Dilution	Method of Application
Buffer pads (polishing and abrasive), Polyurethane and cellulose foam for household sponges and mops, vacuum cleaner bags, umbrellas, casual shoes, athletic shoes	controlled Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	Rate 8 oz./ gallon 2 oz./ quart 1 oz./pint	SPRAY: Dilute GOLDSHIELD 5 TM in water; mix well. Clean surface prior to application. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4"-6" from the surface making sure the surface is completely covered. Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. If necessary, reapply GOLDSHIELD 5 TM every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.
[12] 12 - 12 - 12 - 12 - 12 - 12 - 12 - 1	Pest	Dilution	Method of Application
Tube colored Allowance in the colored	controlled	Rate	SPRAY Dilet COLDCUID PRICE CASE IN 11
Tubs, glazed tiles, vanity tops, shower curtains, shower stalls (areas), sinks,	Odor causing bacteria,	8 oz./ gallon 2 oz./ quart	<b>SPRAY:</b> Dilute <i>GOLDSHIELD</i> 5™in water; mix well. Using a trigger pump sprayer, spray the entire surface area 4"- 6"

#### PAGE 11 - MASTER LABEL FOR GOLDSHIELD 5™

washable walls, wall paper for non-food	bacteria	1 oz./pint	from the surface making sure the surface is completely
contact, floors, window sills, cabinets,	which cause		covered. Let stand until dry or let stand 3 minutes and wipe
garbage cans, appliances, refrigerators	staining and		dry with cloth or sponge. If spotting occurs, wipe with moist
(exterior), fiberglass, formica, glazed	discoloration,		cloth or sponge. If necessary, reapply GOLDSHIELD 5™
tiles, glazed porcelain, synthetic marble,	and		every three months or when odor, staining and discoloration
plastic, vinyl	fungi (mold		due to bacteria, mold stains, and mildew stains return.
	and mildew)		

MOLD, MILDEW, ODOR PROTECTOR AND INHIBITOR *GOLDSHIELD* 5™ is an antimicrobial agent effective against odor causing bacteria.

GOLDSHIELD 5™ is an antimicrobial agent effective against bacteria which cause staining and discoloration.

GOLDSHIELD 5™ is an antimicrobial agent effective against fungi (mold and mildew).

GOLDSHIELD 5™ is an antimicrobial agent effective against algae.

GOLDSHIELD 5TM, an antimicrobial agent, controls the source of odors on surfaces in the home, in the bathroom, in the kitchen. Bacteriostatic, fungistatic (mold and mildew), algaestatic.

GOLDSHIELD 5™an antimicrobial agent, inhibits smelly odors caused by mold and mildew that can grow even in the cleanest of homes.

GOLDSHIELD 5™, an antimicrobial agent, inhibits the growth of odor causing bacteria.

Effective on hard non-porous washable bathroom and kitchen surfaces and fixtures around the home.

Effective on modern hard non-porous washable surfaces made of fiberglass, glazed porcelain, Formica®, stainless steel, synthetic marble.

Imparts microbiostatic properties.

Use on carpet and upholstery to inhibit odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew).

Unscented.

Use on carpet and upholstery to inhibit the growth of odor causing bacteria.

Use on carpet and upholstery to inhibit the growth of bacteria which cause staining and discoloration.

Use on carpet and upholstery to inhibit the growth of fungi (mold and mildew).

Use on carpet and upholstery to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae.

Provides an invisible microbiostatic coating to inhibit the growth of odor causing bacteria.

Provides an invisible microbiostatic coating to inhibit the growth of bacteria which cause staining and discoloration.

Provides an invisible microbiostatic coating to inhibit the growth of fungi (mold and mildew).

Provides an invisible microbiostatic coating to inhibit the growth of algae.

Provides an invisible microbiostatic coating to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae.

Prevents deterioration caused by bacteria and fungi (mold and mildew).

Inhibits deterioration caused by bacteria.

#### PAGE 12 - MASTER LABEL FOR GOLDSHIELD 5TM

Resists development of microbial odors.

Resists development of stains and discoloration due to bacteria.

Resists development of stains due to fungi (mold and mildew).

Resists stains due to algae.

Resists development of microbial odors, stains and discoloration due to bacteria, fungi (mold and mildew), and algae.

Provides/creates an invisible barrier to inhibit the growth of odor causing bacteria.

Provides/creates an invisible barrier to inhibit the growth of bacteria which cause staining and discoloration.

Provides/creates an invisible barrier to inhibit the growth of fungi (mold and mildew).

Provides/creates an invisible barrier to inhibit the growth of algae.

Provides/creates an invisible barrier to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae.

Provides/creates an invisible barrier to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae.

#### STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

Pesticide Storage: Store in original, tightly closed containers below 30°C (86°F) and above 0°C (32°F) in a secure area inaccessible to children and away from food or feed.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. **[For homeowner use the statement will read:** "Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site."]

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke. **[For homeowner use statement will read:** "Container Disposal: Securely wrap original container in several layers of newspaper and discard in trash."]

Note: Any claims for paint use must be for the preservative of the paint in the can. GOLDSHIELD 5™ is to be used as an in can preservative for paints to control the growth of odor causing bacteria, bacteria which causes staining and discoloration, fungi (mold and mildew) and algae.

FOR MORE INFORMATION CONCERNING THIS PRODUCT, PLEASE CONSULT THE MATERIAL SAFETY DATA SHEET (MSDS). THE MSDS CAN BE OBTAINED BY WRITING: NBS Technology, LLC PO Box 428, 157 Skunks Misery Rd, Locust Valley, NY 11560 or emailing: enbst@optonline.net

IMPORTANT: WARRANTY AND DISCLAIMER INFORMATION



NBS Technology, LLC warrants that the product conforms to its chemical description and is reasonably fit for the purposes stated in this bulletin when used in accordance with directions under normal conditions of use; but this warranty of fitness for a particular purpose does not extend to the use of this product contrary to bulletin instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to the seller, and buyer assumes the risk of any such use.

NBS Technology, LLC SPECIFICALLY DISCLAIMS ANY OTHER EXPRESS OR IMPLIED WARRANTY, INCLUDING THE WARRANTY OF MERCHANTABILITY



Tracy Lantz/DC/USEPA/US 04/10/2006 06:31 PM To Michael Hardy/DC/USEPA/US, Betty Shackleford/DC/USEPA/US
Dennis Edwards/DC/USEPA/US@EPA, Velma

Noble/DC/USEPA/US@EPA

bcc

Subject Do not grant letter for 83075-R

I have made one slight change. There was an additional chemistry deficiency (now item #4). Of course my coding at the bottom of the letter will be deleted on the signed copies.



83075-R Not Grant Letter.doc

---- Forwarded by Tracy Lantz/DC/USEPA/US on 04/10/2006 06:25 PM -----



Tracy Lantz/DC/USEPA/US 04/10/2006 04:43 PM

To Michael Hardy/DC/USEPA/US

Dennis Edwards/DC/USEPA/US@EPA, Velma
Noble/DC/USEPA/US@EPA

Subject Re: Jeff Jones....

I just finished the letter a few minutes ago and left you a voice mail on your cell to that effect. As of the last time I spoke with Dennis, about 12:30 PM, there had not be a renegotiation letter from Jeff. Well, now I just saw that as of 4:11 PM Jeff sent in a renegotiation letter giving us until April 27th. Sure hope I didn't waste time preparing this do not grant letter.



83075-R Not Grant Letter.doc

Michael Hardy/DC/USEPA/US



Michael Hardy/DC/USEPA/US 04/10/2006 03:44 PM

To Tracy Lantz/DC/USEPA/US@EPA

cc Velma Noble/DC/USEPA/US@EPA, Dennis Edwards/DC/USEPA/US@EPA

Subject Jeff Jones....

Tracy,

I'm not sure if Jeff Jones came in with a time extension request or not..... If the request is for less than 45 days, AD may not want to accept it... I spoke with Betty and she is in agreement that AD does not have to accept a negotiation for less than 45 days..... In the meantime, how's the not grant draft coming??? I've had discussions with OGC and told them we'd have draft by noon tomorrow....



Jeff Jones <jjones@delta-ac.com> 04/12/2006 11:43 AM Tracy Lantz/DC/USEPA/US@EPA, Velma
Noble/DC/USEPA/US@EPA
Michael Hardy/DC/USEPA/US@EPA, "'Tom Higgins'"
cc <thigginsnbst@optonline.net>, "'Stuart Kaufman'"
<sknbst@optonline.net>

bcc

Subject Goldshield 5; EPA Symbol 83075-R

Attached please find signed cover letter regarding the Goldshield 5 application. The package will be delivered to the mailroom today.

Best regards,

Jeff Jones Delta Analytical Corporation 301 652 5495 V 301 652 5408 F jjones@delta_ac.com



signed cover letter 12 Apr 2006.pdf



April 11, 2006

Document Processing Desk (APPL) Attn: Velma Noble Office of Pesticide Programs Environmental Protection Agency Washington, DC 20460

re: Gold Shield 5; EPA Symbol 83075-R; Response to Product Chemistry Review Dated March 15, 2006

Dear Velma:

Enclosed please find the following documents resubmitted in response to comments in a product chemistry review dated March 15, 2006:

- Summary of response to EPA comments
- Application for Pesticide Registration (EPA Form 8570-1);
- Confidential Statement of Formula (EPA Form 8570-4) (2 copies);
- Revised Data Matrix (EPA Form 8570-34);
- Proposed label (5 copies)

Recognizing that NBS Technology, LLC and I have taken approximately two weeks to respond to various requests for additional information and other issues, <u>I ask that the Agency extend the decision due date on this application from April 13 until April 27</u>.

If you have any questions regarding this submission, please contact me at your convenience at <u>jiones@delta-ac.com</u>. Thanks for your consideration.

Sincerely,

T. Jeffrey Jones, Agent NBS Technologies, LLC

> 7910 Woodmont Avenue Suite 1000 Bethesda, Maryland 20814 (301) 652-5495 FAX (301) 652-5408



Tracy Lantz/DC/USEPA/US 04/10/2006 04:34 PM To Michael Hardy/DC/USEPA/US

cc Dennis Edwards/DC/USEPA/US@EPA, Velma Noble/DC/USEPA/US@EPA

bcc

Subject Re: Jeff Jones....

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83075-R Not Grant Letter.doc

#### Michael Hardy/DC/USEPA/US



Michael Hardy/DC/USEPA/US 04/10/2006 03:44 PM

To Tracy Lantz/DC/USEPA/US@EPA

cc Velma Noble/DC/USEPA/US@EPA, Dennis Edwards/DC/USEPA/US@EPA

Subject Jeff Jones ....

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Michael Hardy Ombudsman and Enforcement Team Leader Antimicrobials Division 703-308-6432



Tom Higgins <a href="mailto:thigginsnbst@optonline.net">thigginsnbst@optonline.net</a>>

04/11/2006 08:49 AM

Jeff Jones <jjones@delta-ac.com>, Velma
To Noble/DC/USEPA/US@EPA, Tracy
Lantz/DC/USEPA/US@EPA

cc Michael Hardy/DC/USEPA/US@EPA, "'Stuart Kaufman'" <sknbst@optonline.net>

bcc

Subject Re: see attachments

Thanks Jeff, This looks very good. ---- Original Message ----

From: Jeff Jones

To: noble.velma@epa.gov; Lantz.Tracy@epamail.epa.gov

Cc: Hardy.Michael@epamail.epa.gov; 'Tom Higgins'; 'Stuart Kaufman'

Sent: Monday, April 10, 2006 4:10 PM

Subject: see attachments

Attached please find a cover letter and response to comments which will be delivered to the mailroom tomorrow.

Note that I have requested an extension from April 13 to April 27. That extension should give the Agency sufficient time to complete its review since I have changed my method of data support to "cite-all" for the analytical method which seemed to be the remaining issue when we last talked.

I'll await your comments.

Best regards,

Jeff Jones Delta Analytical Corporation 301 652 5495 V 301 652 5408 F jjones@delta-ac.com



Jeff Jones <jjones@delta-ac.com> 04/10/2006 04:10 PM To Velma Noble/DC/USEPA/US@EPA, Tracy
Lantz/DC/USEPA/US@EPA
Michael Hardy/DC/USEPA/US@EPA, "'Tom Higgins'"
cc <thigginsnbst@optonline.net>, "'Stuart Kaufman'"
<sknbst@optonline.net>

bcc

Subject see attachments

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I'll await your comments.

Best regards,

Jeff Jones Delta Analytical Corporation 301 652 5495 V 301 652 5408 F jjones@delta-ac.com





response to EPA product chemistry review dated 15 Mar 2006.pdf | cover letter.pdf

April 10, 2006

Document Processing Desk (APPL) Attn: Velma Noble Office of Pesticide Programs Environmental Protection Agency Washington, DC 20460

re: Gold Shield 5; EPA Symbol 83075-R; Response to Product Chemistry Review Dated March 15, 2006

Dear Velma:

Enclosed please find the following documents resubmitted in response to comments in a product chemistry review dated March 15, 2006:

- Summary of response to EPA comments
- Application for Pesticide Registration (EPA Form 8570-1);
- Confidential Statement of Formula (EPA Form 8570-4) and Certification Statement (2 copies);
- Certification with Respect to Citation of Data and Data Matrix (EPA Form 8570-34);
- Proposed label (5 copies)

Recognizing that NBS Technology, LLC and I have taken approximately two weeks to respond to various requests for additional information and other issues, <u>I ask that the Agency extend the decision due date on this application from April 13 until April 27</u>.

If you have any questions regarding this submission, please contact me at your convenience at <u>jiones@delta-ac.com</u>. Thanks for your consideration.

Sincerely,

T. Jeffrey Jones, Agent NBS Technologies, LLC

## Response to Product Chemistry Review Goldshield 5; EPA Symbol 83075-R 10 April 2006

Commment #1:

The concentration of the active ingredient on the confidential statement of formula is inconsistent with the label declaration. The registrant must

revise the CSF and/or the label so that they match exactly.

NBS Response:

The concentration of the active ingredient on the label and CSF is consistent, i.e. 5%, however, the active ingredient name on the CSF and label were inconsistent. The label and the CSF now specify the active ingredient as 3-(trimethoxysilyl) propyl dimethyl octadecyl ammonium choride.

Commment #2:

The stabilizer in the formulation is not cleared for use in pesticidal

formulations

NBS Response:

After consultation with Chris Jiang, NBS has substituted a stabilizer

which Chris identified as previously cleared.

Commment #6:

The enforcement analytical method is unacceptable.

NBS Response:

NBS Technology is submitting a new data matrix changing its method of

data support to cite-all to address the analytical method requirement.

Commment #8, 9, 14 The density, pH, and viscosity data results are unacceptable..."because the

test[s] [were] not conducted under GLP compliance."

NBS Response:

These findings about the acceptability of non-GLP data are erroneous. As the Agency now recognizes, it does not have the authority to reject data simply because GLP requirements were not completely followed. According to 40 CFR 160.12 (b) an applicant must describe "in detail all

differences between the practices used in the study and those required by this part...." Only after weighing the significance of departures from GLP requirements may the Agency consider rejecting the data as inadequate to

address the applicable data requirements.

The GLP statement page for the physical and chemical properties study has been revised to discuss departures from GLP requirements in detail as required. None of the departures described would appear to be significant considering the nature of the density, pH and viscosity determinations

involved.

Dennis Edwards/DC/USEPA/US 04/07/2006 04:12 PM To Tracy Lantz/DC/USEPA/US@EPA

CC

bcc

Subject Fw: Goldshield 5; EPA Reg. No. 83075-R

Dennis Edwards
Antimicrobials Division
703-308-8087
----- Forwarded by Dennis Edwards/DC/USEPA/US on 04/07/2006 04:12 PM -----



Jeff Jones <jjones@delta-ac.com> 04/06/2006 04:46 PM

To Velma Noble/DC/USEPA/US@EPA

Dennis Edwards/DC/USEPA/US@EPA, Karen Hicks/DC/USEPA/US@EPA, Michael

Hardy/DC/USEPA/US@EPA, Frank
Sanders/DC/USEPA/US@EPA

Subject Goldshield 5; EPA Reg. No. 83075-R

#### Velma:

Would you please confirm that you and Dennis told me yesterday that the Agency needed 30-45 days to complete the GLP deviation assessment? Today I understood from you and Karen that you could complete the GLP deviation assessment relatively quickly, but that at least 45 days would be necessary to review our new analytical method submission.

Can you understand that I would be skeptical that it will actually take 45 days to review the analytical method information when what yesterday was going to take 30-45 days (the GLP deviation review) today can be done prior to the decision due date or shortly thereafter?

Best regards,

Jeff Jones Delta Analytical Corporation 301 652 5495 V 301 652 5408 F ijones@delta-ac.com



Michael Hardy/DC/USEPA/US 04/11/2006 10:05 AM To Tracy Lantz/DC/USEPA/US@EPA

CC

bcc

Subject Fw: Goldshield 5; EPA Reg. No. 83075-R

Michael Hardy
Ombudsman and Enforcement Team Leader
Antimicrobials Division
703-308-6432

---- Forwarded by Michael Hardy/DC/USEPA/US on 04/11/2006 10:04 AM ----



Jeff Jones <jjones@delta-ac.com> 04/06/2006 04:46 PM

To Velma Noble/DC/USEPA/US@EPA

Dennis Edwards/DC/USEPA/US@EPA, Karen Hicks/DC/USEPA/US@EPA, Michael

Hardy/DC/USEPA/US@EPA, Frank Sanders/DC/USEPA/US@EPA

Subject Goldshield 5; EPA Reg. No. 83075-R

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Jeff Jones Delta Analytical Corporation 301 652 5495 V 301 652 5408 F jjones@delta-ac.com



Michael Hardy/DC/USEPA/US 04/11/2006 10:05 AM

To Tracy Lantz/DC/USEPA/US@EPA

CC

bcc

Subject Fw: The saga continues

Michael Hardy
Ombudsman and Enforcement Team Leader
Antimicrobials Division
703-308-6432
----- Forwarded by Michael Hardy/DC/USEPA/US on 04/11/2006 10:04 AM -----



Jeff Jones <jjones@delta-ac.com> 04/06/2006 04:14 PM

To Michael Hardy/DC/USEPA/US@EPA

CC

Subject The saga continues

#### Michael:

I had a frustrating call with Velma Noble and Karen Hicks this afternoon. I missed you and Frank. Hope your son is OK.

On yesterday's call, Velma and Dennis told me the chemistry team couldn't possibly complete the GLP deviation review without a 30-45 day extension. Today Velma and Karen tell me that the GLP review could be completed quickly but there's another issue, the enforcement analytical method. So now because of the analytical method a review period of 45 days is needed.

I'll be making a submission either tomorrow or Monday. I'm willing to request an extension but it won't be 45 days.

Best regards,

Jeff Jones Delta Analytical Corporation 301 652 5495 V 301 652 5408 F jjones@delta-ac.com



Michael Hardy/DC/USEPA/US 04/04/2006 09:52 AM Frank Sanders/DC/USEPA/US@EPA, Betty
To Shackleford/DC/USEPA/US@EPA, Dennis
Edwards/DC/USEPA/US@EPA, Mark
Velma Noble/DC/USEPA/US@EPA, Tracy
Lantz/DC/USEPA/US@EPA

bcc

Subject Fw: GLP compliance assessment; EPA Symbol 83075-R

All.

Here's a copy of what the company has compiled as to what they did and didn't do under GLP..... Thoughts???

Michael Hardy Ombudsman and Enforcement Team Leader Antimicrobials Division 703-308-6432

--- Forwarded by Michael Hardy/DC/USEPA/US on 04/04/2006 09:48 AM ----



Jeff Jones <jjones@delta-ac.com> 04/03/2006 10:07 AM

To Michael Hardy/DC/USEPA/US@EPA

cc thigginsnbst@optonline.net, "Stuart Kaufman" <sknbst@optonline.net>

Subject GLP compliance assessment; EPA Symbol 83075-R

#### Michael:

I'm attaching a questionnaire that I prepared on Friday to try to document our state of compliance with GLP requirements for pH, viscosity and density. The attachment also contains preliminary answers from manufacturing lab as to compliance which you will see is extensive. At the moment we're engaged in documenting answers to our satisfaction so that we can sign the appropriate GLP statement.

I wanted to share this document in draft form so that you can see that the GLP requirements are extensive even for chemistry studies and that we are making a serious effort to assess our state of compliance in a timely fashion. I must say, having started this exercise, that I am less confident now that the human health and environmental protection benefits of strict GLP compliance outweigh the costs for these types of studies.

Best regards,

Jeff Jones

Delta Analytical Corporation 301 652 5495 V 301 652 5408 F jjones@delta-ac.com

GLP compliance assessment with answers 31 Mar 2006.pdf

#### ---DRAFT---

## **Questions for Glo-tex regarding FIFRA GLP compliance** March 31, 2006

- 1. Does Glo-tex maintain a current summary of training and experience and job description for each individual engaged in or supervising the conduct density, pH, and viscosity studies, herein after "studies?" Yes. We conduct significant training in each of our job positions, and we conduct personnel reviews and ratings on performance.
- 2. Has Glo-tex designated a study director for each study before it was initiated? Yes, however we have designated this position title as Quality Control Supervisor (QCS)
- 3. Has the study director assured that all raw data, documentation, protocols, specimens, and final reports are transferred to the archives at the close of the studies? Yes, and all archives are available for review by management or by individuals authorized by management.
- 4. Is access to study archives limited to authorized personnel only? Yes, only limited Quality Control personnel, and of course senior management.
- 5. Does Glo-tex have a Quality Assurance Unit (QAU) which is responsible for monitoring each study to assure management that the facilities, equipment, personnel, methods, practices, records, and controls are in conformance with the requirements of 40 CFR 160? Yes, according to our reading and understanding of 40CFR 160 we would be in compliance with this section and our Quality Assurance Department would be responsible for the activities detailed above.
- 6. Is the QAU independent of the personnel engaged in the direction and conduct of the study? The QA individual is a separate management position from that of our QCS position. We also permit quality assurance specialists from our key clients to work with us in review of our studies relating to their products.
- 7. Does the QAU conduct inspections and maintain records appropriate for each study? Yes
- 8. Does the QAU have written inspection procedures? Yes to elaborate, we conform and have employed ISO procedures.
- 9. Does Glo-tex have written standard operating procedures (SOPs) setting forth the

methods, materials, and schedules to be used in the routine inspection, cleaning, maintenance, testing, calibration, and/or standardization of equipment. Yes, if required we can provide those daily procedures upon request. For example we clean and inspect all equipment each day, generally in the morning. All production equipment and QC lab testing equipment is proven for accuracy and precision prior to use. And all equipment is appropriately stored and adequately protected between uses, and verified or re-calibrated at appropriate intervals to ensure control of accuracy and precision. For instruments that are calibrated by an instrument calibration company, QCM (quality control manager) makes sure the company utilizes methods and procedures that are in accordance with nationally ( & internationally) recognized standards.

- 10. Do these SOPs include remedial action to be taken in the event of failure or malfunction of equipment? Yes. An example is a calibrating schedule is maintained, indicating the time period for calibration for each instrument used in production and quality testing. Each instrument has been given a unique identifying number. In the event that a piece of equipment is found out of the agreed range or accuracy, it is immediately withdrawn from use pending repair/re-calibration. The test results from any products recently manufactured using that equipment and any remaining stock is checked. In the case of any discrepancy the batch is withdrawn from stock and labeled non-conforming. Using the appropriate label pending re-mixing/repackaging as appropriate.
- 11. Are written records maintained of all inspection, maintenance, testing, calibrating, and/or standardizing operations? Yes.
- 12. Are these records dated and do they describe whether maintenance operations were routine and SOPs were followed? Yes
- 13. Are written and dated records kept of non-routine repairs? Yes
- 14. Do these records document the nature of the defect, how and when the defect occurred, and the remedial action taken when the defect was discovered? Yes as described above.
- 15. Does Glo-tex have SOPs in writing setting forth study methods? Yes
- 16. Are deviations from standard study methods authorized by the Study Director and documented in raw data? We do not deviate our standards and criteria, however if there was case that warranted such action it would have to be authorized by our QCS.

- 17. Are significant changes in established standard operating procedures properly authorized in writing by management? Yes, absolutely no action is taken arbitrarily.
- 18. Are there SOPs for receipt, identification, storage, handling, mixing, and method of the test, control and reference substances? Yes
- 19. Are there SOPs for laboratory tests? Yes
- 20. Does each laboratory or study area have immediately available manuals and SOPs relative to laboratory procedures being performed? Yes
- 21. Does Glo-tex have a historical file of standard operating procedures, and all revisions thereof, including dates of such revisions? Yes
- 22. Are all reagents and solutions in the laboratory areas labeled to indicate identity, titer or concentration, storage requirements and expiration dates? Yes
- 23. Are the stability of test, control, and reference substances under storage conditions at the site known for all studies? Yes
- 24. Are procedures established for a system of handling of the test, control, and reference substances to 1) insure proper storage, 2) distribution is made in a manner designed to preclude the possibility of contamination, deterioration, or damage, 3) proper identification is maintained throughout the distribution process, and 4) the receipt an distribution of each batch is documented by quantity and date? Yes
- 25. Does each study conducted have an approved written protocol that clearly indicates the objectives and all methods for conduct of the study? Yes
- 26. Does each written protocol contain 1) a descriptive title and statement of the purpose of the study, 2) identification of the test, control, and reference substance by name, CAS Number or code number, 3) the name and address of the sponsor and the name and address of the testing facility, 4) the proposed experimental start and termination dates? Yes all of this information is retained in manuals.
- 27. Does each written protocol contain the records to be maintained? Yes, as above.

- 28. Does each written protocol contain the date of approval of the protocol by the sponsor and the dated signature of the study director? Yes
- 29. Are all changes in or revisions to the written protocol, and the reasons therefore, documented signed by the study director, dated and maintained with the protocol?

Yes

30. Are specimens collected during the conduct of studies identified by study, nature, and date of collection? Is this information located on the specimen container?

Yes

31. Is all data generated during the conduct of studies recorded directly, promptly, and legibly in ink?

Yes Many of these questions relate to the procedures we have developed, and our record keeping which in many instances are recorded in computers, under certificate of analysis (COA) folders

32. Are data entries dated on the date of entry and signed or initialed by the person entering the data?

Yes

33. Are all changes in entries made so as not to obscure the original entry, to indicate the reason for the changes, and dated and signed.

Yes

34. Are final reports prepared for each study containing 1) the name and address of the testing facility, 2) the dates on which the study was initiated, completed, terminated, or discontinued, 3) the objectives and procedures stated in the approved protocol (including any changes), 4) the statistical methods employed for analyzing the data, 5) the test, control and reference substances identified by name, CAS Number or code number, strength, purity and composition or other appropriate characteristics, 6) a description of all circumstances that may have affected data quality or integrity, 7) a description of the transformations, calculations, or operations performed on the data, a summary and analysis of the data, and a statement of the conclusions drawn form the analysis, 8) the locations where all specimens, raw data, and the final report are to be stored?

Yes

35. Is the final report signed and dated by the study director?

Yes

36. Are corrections or additions to the final report in the form of an amendment by the study director?

Yes, our QCS

37. Do these corrections clearly identify that part of the final report that is being added or corrected and the reasons for the additions or corrections?

Yes

38. Are the additions and corrections signed and dated by the person making the changes?

Yes

39. Is a copy of the final report and of any amendment maintained by the sponsor and the test facility?

Yes

40. Does Glo-tex retain all raw data, documentation, records, protocols, specimens, and final reports in an archive?

Yes

41. Are correspondence and other documents relating the interpretation and evaluation of data retained?

Yes

42. Is an individual indentified as responsible for the archives? Yes, separate job description.

43. Is access to the archives restricted to authorized personnel?

Yes

- 44. Are archival materials indexed to permit expedient retrieval? Yes
- 45. Are archival records maintained for the longer of the period of time the pesticide product is registered, in the case of data submitted to EPA for any reason at least five years, and in the case of data not submitted to EPA at least two years?

Yes

46. Are summaries of training and experience and job descriptions for those employees associated with studies retained?

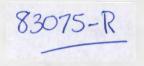
Yes, as discussed above in review and rating performance.

47. Are records and reports of maintenance and calibration and inspection of equipment retained?

Yes

48. In the event that the testing facility or archiving facility go out of business, is there provision in place to transfer all raw data, documentation, and other archival material to the sponsor?

Not at this moment. We have been in business for many years and have no intention of going out of business. Should there ever be reason to avail ourselves of the insolvency laws, we will make provisions to transfer data to our respective clients.





Michael Hardy/DC/USEPA/US 03/31/2006 10:50 AM To Jeff Jones <jjones@delta-ac.com>

Dennis Edwards/DC/USEPA/US@EPA, Frank CC Sanders/DC/USEPA/US@EPA, Betty Shackleford/DC/USEPA/US@EPA, Mark

bcc

Subject GLP Studies Issue for Pending Registration.....

Jeff.

Per our telephone conversation earlier today, AD has been given guidance from OGC that studies do not have to be submitted under GLP for purposes of registration. However, according to 40 CFR Part 160.12(b), if the study is not conducted under GLP, the registrant must provide "a statement describing in detail all differences between the practices used in the study and those required by this part...." As such, if the chemistry data in question have this statement, then your studies do not have to be GLP.

In reference to a conditional registration while the issues concerning the chemistry data are resolved, OGC also advised against granting such a registration. The week prior to the meeting with OGC, I informed you that AD may be able to issue a conditional registration due to the GLP issues surrounding ph and the analytical method. It was discussed at the meeting with OGC that in the past there have been conditional registrations granted for chemistry data by AD, however, OGC has stated that should have not taken place and the practice must be stopped. Therefore, it appears that AD no longer has the ability to issue a conditional registration for Tier 1 data.

I hope this helps clarify what was attempted as a resolution to the issue(s) prior to the meeting with OGC and the path that AD now has to follow. If you have any questions, please let me know.

Michael Hardy
Ombudsman and Enforcement Team Leader
Antimicrobials Division
703-308-6432
Jeff Jones <iijones@delta-ac.com>



Jeff Jones <jjones@delta-ac.com> 03/31/2006 09:15 AM

To Michael Hardy/DC/USEPA/US@EPA, Dennis Edwards/DC/USEPA/US@EPA

CC

Subject FW: Goldshield 5; EPA Symbol 83075-R

#### Michael:

I meant to copy Dennis on the previous message. I do <u>not</u> want to appear to be playing both ends against the middle!

Best regards,

Jeff jjones@delta-ac.com **From:** Jeff Jones [mailto:jjones@delta-ac.com]

Sent: Friday, March 31, 2006 9:13 AM
To: 'Hardy.Michael@epamail.epa.gov'
Subject: Goldshield 5; EPA Symbol 83075-R

#### Michael:

I had a conversation with Dennis Edwards and Tracy Lantz yesterday regarding the application we discussed last week. Dennis told me that we still had GLP issues on the application and a conditional registration pending submission of GLP data was not an option. That seems dramatically inconsistent with my understanding of our conversation late last Thursday morning. My email to my client after our conversation said:

I spoke to Michael Hardy a little while ago and he told me that the Agency would not reject our application on the GLP issue. They would be willing to issue a conditional registration requiring eventual submission of GLP data.

I also understood from our conversation that the discussion of this issue had "split the room" in a meeting that I believe included you, Frank and the Branch Chiefs. Under the circumstances I do not understand how AD can defend taking such a hard line on the Goldshield application. I didn't have my notes in front of me when I talked with Dennis yesterday, and I didn't want to take the chance of misrepresenting what we discussed.

May I respectfully suggest that the program, whether AD or OPP, simply write down how it intends to apply the GLP requirements to product chemistry studies in the future. Given the internal splits on this issue, wouldn't it be advisable to set down a written policy that everyone agrees to support and implement. If the decision is to require substantial GLP compliance on product chemistry studies in the future, that after date certain, say June 30, studies not conducted in accordance will GLPs will be presumptively considered invalid, and conditional registrations will not be granted while GLP studies are conducted. I told Dennis I thought this should be done in a PR Notice; he said that would take years. If that's not possible, why not put the policy statement on the website and publicize in the trade press.

Best regards,

Jeff Jones Delta Analytical Corporation 301 652 5495 V 301 652 5408 F jjones@delta-ac.com



Jeff Jones <jjones@delta-ac.com> 03/24/2006 02:40 PM

To Michael Hardy/DC/USEPA/US@EPA

Tracy Lantz/DC/USEPA/US@EPA, Velma
Noble/DC/USEPA/US@EPA

bcc

Subject FW: Goldshield 5; EPA symbol 83075-R

ment by how I have been to

#### Michael:

I provided a revised CSF with the acceptable stabilizer to Chris Jiang in person on Wednesday afternoon. Can someone update me on where things stand? Is there anything else that I need to do pending the label review?

Best regards,

Jeff
jjones@delta-ac.com

----Original Message----

From: Jeff Jones [mailto:jjones@delta-ac.com]

Sent: Monday, March 20, 2006 11:49 AM To: 'Hardy.Michael@epamail.epa.gov'

Cc: 'Lantz.Tracy@epamail.epa.gov'; 'noble.velma@epa.gov'

Subject: RE: Goldshield 5; EPA symbol 83075-R

#### Michael:

I spoke to Chris Jiang a few minutes ago, and we have identified an alternative stabilizer that is acceptable to him.

Can you confirm that the other deficiencies may be handled as conditions of registration pending further reviews by the PM team?

Best regards,

Jeff
jjones@delta-ac.com



Jeff Jones <jjones@delta-ac.com> 03/20/2006 11:49 AM

To Michael Hardy/DC/USEPA/US@EPA

Tracy Lantz/DC/USEPA/US@EPA, Velma
Noble/DC/USEPA/US@EPA

bcc

Subject RE: Goldshield 5; EPA symbol 83075-R

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Best regards,

Jeff jjones@delta-ac.com



Tracy Lantz/DC/USEPA/US 03/28/2006 11:24 AM

To Jeff Jones <jjones@delta-ac.com>

Michael Hardy/DC/USEPA/US@EPA, Velma
cc Noble/DC/USEPA/US@EPA, Dennis
Edwards/DC/USEPA/US

bcc

Subject Re: FW: Goldshield 5; EPA symbol 83075-R



Chris has not yet had the opportunity to review the revised CSF which was submitted last week. At this point we do not know the outcome of his review. Once his review has been completed I will give you additional information on the status of this submission.

Jeff Jones < jjones@delta-ac.com>



Jeff Jones <jjones@delta-ac.com> 03/24/2006 02:40 PM

To Michael Hardy/DC/USEPA/US@EPA

cc Tracy Lantz/DC/USEPA/US@EPA, Velma Noble/DC/USEPA/US@EPA

Subject FW: Goldshield 5; EPA symbol 83075-R



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jjones@delta-ac.com

----Original Message----

From: Jeff Jones [mailto:jjones@delta-ac.com]

Sent: Monday, March 20, 2006 11:49 AM To: 'Hardy.Michael@epamail.epa.gov'

Cc: 'Lantz.Tracy@epamail.epa.gov'; 'noble.velma@epa.gov'

Subject: RE: Goldshield 5; EPA symbol 83075-R



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Best regards,

Jeff
jjones@delta-ac.com



Jeff Jones <jjones@delta-ac.com> 03/15/2006 04:19 PM To Tracy Lantz/DC/USEPA/US@EPA, Velma Noble/DC/USEPA/US@EPA

cc sknbst@optonline.net

bcc

Subject Goldshield 5 chemistry review; EPA Symbol 83075-R

Dear Tracy:

Thank you for faxing the chemistry review dated March 15. I have quickly evaluated it and suggest that only items 2 and 6 might take some time to resolve. I take issue with items 8, 9, and 14 which reject physical and chemical properties information because these studies were "not conducted under GLP compliance." I am not aware of any written statement of policy that these studies must be conducted with strict adherence to GLP requirements and I know that historically the Agency has accepted many similar studies that were not GLP. If such a statement of policy exists, I would appreciate receiving a copy.

I will discuss items 2 and 6 with NBS Technology and get back to you regarding your request for us to voluntarily extend the decision due date.

Thanks for your consideration.

Best regards,

Jeff Jones
Delta Analytical Corporation
>801 652 5495 V
301 652 5408 F
ijones@delta-ac.com

3/16/06

Michael Hordy called Jeff Jones to try to establish a renegotiated time frame.

TRANSMISSION OK

TX/RX NO

3811

CONNECTION TEL

913016525408

SUBADDRESS

CONNECTION ID

Delta

ST. TIME

03/15 16:11

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PGS.

4

RESULT

OK

### United States Environmental Protection Agency

Washington, D.C. 20460



# Office of Prevention, Pesticides and Toxic Substances Office of Pesticide Programs

Antimicrobial Division

FAX NUMBER (703 )308-8481

**233** 

### FACSIMILE REQUEST/COVER SHEET

(Please type or print clearly in black ink only)

### SEND FAX TO:

Name:	Veff Jones
Office:	
FAX phone No	301 652
Office Phon :	301 652 5495
From:	
Name:	Trany Lantz
Division/Br: nch:	AB
Office Phon : No:	703 308 6415
Mail Code: 7510C	Date: 3 15 06 Time: 3:15 PM
Number of 1 ages (with this co	over sheet): 4
Special Mes age:	

# United States Environmental Protection Agency Washington, D.C. 20460



# Office of Prevention, Pesticides and Toxic Substances Office of Pesticide Programs

Antimicrobial Division
FAX NUMBER (703 )308-8481

#### FACSIMILE REQUEST/COVER SHEET

(Please type or print clearly in black ink only)

#### **SEND FAX TO:**

Name:	Veff Jones				
Office:					
FAX phone No	MATERIAL ASSESSMENT OF THE PROPERTY AND				
Office Phone.	301 652 5495				
From:					
Name:	Trany Lantz				
Division/Branch:	AB				
	703 308 6415				
Mail Code: 7510 C	Date: 3 15 06 Time: 3:15 PM				
Number of pages (with this	cover sheet): 4				
Special Message:					
4					

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460



1

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES Antimicrobials Division

#### March 15, 2006

SUBJECT: PRODUCT CHEMISTRY REVIEW OF: Goldshield5

DP Barcode: D326126

П

OR

Reg. No. Or File Symbol: 83075-R

**End-use Product [X]** 

TO:

Velma Noble\Tracy Lantz

PM Team No. 31

TGAI\MUP

FROM:

Chris Jiang, Chemist

Product Science Branch

Antimicrobials Division (7510C)

THRU:

Karen P. Hicks, CTT Team Leader

Product Science Branch

Antimicrobials Division (7510C)

THRU:

Michele Wingfield, Branch Chief

Product Science Branch

Antimicrobials Division (7510C)

Product Formulation for Goldsheild5 from label

Active Ingredient(s)

% by wt.

5.0 %

Octadecylaminodimethyltrihydroxysilyl propyl ammonium chloride

#### **BACKGROUND:**

ţ

The registrant has submitted a product chemistry package in support of a new registration of a microbiostatic agent. The package contains a label, a Confidential Statement of Formula, and studies that have been identified by the Agency as MRID #'s 446731901 and 46718501.

#### FINDINGS:

- 1. The concentration of the active ingredient on the Confidential Statement of Formula (CSF dated 12 Dec 2005) is inconsistent with the label declaration. The registrant must revise the CSF and/or label so that they match exactly.
- 2. The stabilizer in the formulation is not cleared for use in pesticidal formulations. The registrant must either substitute the uncleared inert with an already cleared inert or have the supplier send the complete compositional information of the uncleared ingredient to the Agency. The information must include the product name (which must exactly match the name on the CSF), manufacturer name/address and complete chemical composition including the chemical name, CAS Reg. No. and percentage by weight for each component of the mixture. This information must be typed on manufacturer's letterhead and accompanied by a signature.
- 3. The descriptions of the starting materials and the manufacturing\production\formulation process are **acceptable**, pending clearance of the uncleared inert.
- 4. The discussion of the formation of impurities is acceptable.
- 5. The certified limits cannot be determined because of the uncleared inert. The registrant may wish to alter the formulation with other inerts and this would necessitate recalculation of the certified limits.
- 6. The enforcement analytical method is **unacceptable**. The data that was submitted address the manner in which total solid content is analyzed and does not address how the product is analyzed for the concentration of the active ingredient.
- 7. The color, physical state, and odor are **acceptable** as the product is a pale yellow to off-white liquid which is odorless to slight alcohol.
- 8. The density is **unacceptable**. The CSF states that the density 8.34 lbs/gal, but the unsigned self-certification gives a value of 8.32 lbs/gal. This test must also be conducted under GLP compliance.
- 9. The pH is **unacceptable** because the test was not conducted under GLP compliance.
- 10. The oxidation/reduction potential is **acceptable** as the product contains neither oxidizing nor reducing agents.

- 11. The flammability is **acceptable** as the product is non-flammable.
- 12. The explodability is acceptable as the product does not contain potentially explosive materials.
- 13. The tests for storage stability and corrosion characteristics are ongoing. They must be conducted under GLP compliance.
- 14. The viscosity is unacceptable because the test was not conducted under GLP compliance.
- 15. The miscibility is **acceptable** as the product is dispersible in water.
- 16. The dielectric breakdown voltage is **acceptable** as the product will not be used around electrical equipment.

#### **RECOMMENDATIONS:**

ļ

1. Product Science Branch of Antimicrobials Division finds this submission in support of the registration of 83075-R to be unacceptable for the reasons stated in the findings. The registrant must remedy the problems stated in the findings before registration can proceed.



Jeff Jones <jjones@delta-ac.com> 03/15/2006 09:45 AM

Tracy Lantz/DC/USEPA/US@EPA

Velma Noble/DC/USEPA/US@EPA, Dennis
cc Edwards/DC/USEPA/US@EPA, Michael
Hardy/DC/USEPA/US@EPA

bcc

Subject RE: Submission for Gold Shield 5 83075-R

Dear Ms. Lantz:

I don't want to be argumentative, but I can't understand how you or I can conclude there's inadequate time to address issue in this cycle if neither of us has any written statement of what the problem is. I do know that I have successfully resolved product chemistry issues within original PRIA 90-day timeframes. That makes your request to agree to a 90-day extension without any understanding of the questions raised unusual in my experience.

Please fax any background information as it becomes available. I understand that the Agency cannot guarantee security of information which is transmitted to me by fax.

Best regards,

Jeff jjones@delta-ac.com 3/15/06

Phore call w

Velma @ 1:30 PM

301 652 5495

3/16/06 Chris said:
analytical enforcements method is unacceptable
stublizer is not approved for use in posticial formulas
revise CSF

I should rec. review today - then will Fax to J. Jones. faxed to him 3/15/06 @ 3:20PM



Tracy Lantz/DC/USEPA/US 03/14/2006 05:29 PM bcc

Subject RE: Submission for Gold Shield 5 83075-R

I have not yet received the review, this issue was just brought to my attention as a deficiency that cannot be resolved in this review cycle.

There is not adequate time left in this review cycle for this type of information to be requested from your supplier, received by the Agency, and then sent for review to the appropriate individual you makes decisions regarding inert ingredients.

Whenever a deficiency such as this arises in conjuction with a PRIA action, the company is asked, just as you have been, to work with us to renegotiate the due date. Since this is a 90 day action, we again ask for the company to agree to an additional 90 day review time frame after receipt of the requested information. This allows the chemists adequate time to make the decision as well as time at the end of the cycle for me to take care of any regulatory issues or corrections needed to forms or the labeling.

I will be happy to FAX the review to you. Do you agree that it may be faxed, even though it will contain confidential business information? We cannot grantee the security of our fax lines.

Jeff Jones <jjones@delta-ac.com>



Jeff Jones <jjones@delta-ac.com> 03/14/2006 04:28 PM

To Tracy Lantz/DC/USEPA/US@EPA

Velma Noble/DC/USEPA/US@EPA, Dennis
cc Edwards/DC/USEPA/US@EPA, Michael
Hardy/DC/USEPA/US@EPA

Subject RE: Submission for Gold Shield 5 83075-R

Please forward a copy of the review by email or fax identifying the inert ingredient issues that have been raised. I don't think it is appropriate for the Agency expect me to request a 90-day extension when I have no information on the problem identified or how difficult it may be to resolve.

Thanks for your consideration.

Best regards,

Jeff Jones 301 652 5495 voice 301 652 5408 fax jjones@delta-ac.com



Tracy Lantz/DC/USEPA/US 03/14/2006 04:10 PM

To jjones@delta-ac.com

Velma Noble/DC/USEPA/US@EPA, Dennis

cc Edwards/DC/USEPA/US@EPA, Michael Hardy/DC/USEPA/US@EPA

bcc

Subject Submission for Gold Shield 5 83075-R

Dear Mr. T. Jeffrey Jones,

We are still in the process of doing the initial assessment of the information submitted in support of this application. At this point we have identified a concern that can not be quickly resolved. There is an inert ingredient in this product which has not be approved for use in pesticides. As such we will require additional information on this ingredient and then that information will be sent to review for approval as an inert for pesticides. At this point there is not enough review time left to resolve this issue.

We need to start the renegotiation process. The Agency will require an additional 90 days after receipt of this information to complete the review. It is suggested that you send me a letter/e-mail with your proposed new due date. It is suggested that you allow the Agency an additional 90 days beyond the current due date of 4/13/06. There may be additional chemistry concerns identified by the end of this week. As soon as I am made aware of any other concerns, I will be in touch with you.

Thanks, Tracy Lantz 703 308 6415

### PRIA

#### **DATA PACKAGE BEAN SHEET**

Date: 01-Feb-2006
Page 1 of 1

**Decision #: 363320** 

DP #: (326126)

5788195

#### * * * Registration Information * * *

Registration:	83075-R - GOLD	SHIELD 5				<u> </u>	
Company:	83075 - NBS TECHNO	DLOGY, LLC					
Risk Manager:	RM 31 - Velma Noble - (703) 308-6233 Room# CM-2 308B						
isk Manager Reviewer:	Tracy Lantz TLANTZ						
Sent Date:							
Type of Registration:	Product Registration -	Section 3	`	OK			
Action Desc:	(A53) ME-TOO;NEW	PRODUCT;FAST T	TRACK;				
Ingredients:	107403, 1-Octadecan	aminium,N,N-dimet	thyl-N-[3-(trihy	droxysilyl)pro	oyl],chloride(5%)		
		******			<u>-</u>		
•	sk st	* * Data Pacl	kage Info	rmation	* * *		
Expedite:	◯ Yes ● No		Date Sent:	01-Feb-2006		Due Back:	
DP Ingredient:	107403, 1-Octadecana	aminium,N,N-dimet	thyl-N-[3-(trihy	droxysilyl)proj	oyl],chloride		3.97
DP Title:							
CSF Included:	○ Yes ● No	Label Included:	○ Yes ●	No Par	rent DP #:		
Assigned To	o_	Date	In	Date Out			
Organization: AD / F	SB				Last Possible S	Science Due Date:	14-Mar-2006
Team Name: CTT					_ 	Science Due Date:	
Reviewer Name:	Chris	2/1	16			ackage Due Date:	
actor Name:							
	***	Studies Ser	nt for Rev	/iew * * *			

No Studies

* * * Additional Data Package for this Decision * * *

No Additional Data Packages

* * * Data Package Instructions * * *

Please review enclosed product chemistry data: MRID 467185-01. CSF, cover letter and label enclosed.

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460



OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES Antimicrobials Division

March 15, 2006

SUBJECT: PRODUCT CHEMISTRY REVIEW OF: Goldshield5

DP Barcode: D326126

TGAI\MUP

n

OR

Reg. No. Or File Symbol: 83075-R

End-use Product [X]

TO:

Velma Noble\Tracy Lantz

PM Team No. 31

FROM:

Chris Jiang, Chemist

Product Science Branch

Antimicrobials Division (7510C)

THRU:

Karen P. Hicks, CTT Team Leader

Product Science Branch

Antimicrobials Division (7510C)

THRU:

Michele Wingfield, Branch Chief

Product Science Branch

Antimicrobials Division (7510C)

Product Formulation for Goldsheild5 from label

Active Ingredient(s)

% by wt.

Octadecylaminodimethyltrihydroxysilyl propyl ammonium chloride

received by T. Lantz on 3/28/06 after revision,

5.0 %

#### **BACKGROUND:**

The registrant has submitted a product chemistry package in support of a new registration of a microbiostatic agent. The package contains a label, a Confidential Statement of Formula, and studies that have been identified by the Agency as MRID #'s 446731901 and 46718501.

#### **FINDINGS:**

- 1. The concentration of the active ingredient on the Confidential Statement of Formula (CSF dated 22 March 2006) is inconsistent with the label declaration. The registrant must revise the CSF and/or label so that they match exactly.
- 2. All ingredients are cleared for use in pesticidal formulations.
- 3. The descriptions of the starting materials and the manufacturing\production\formulation process are acceptable.
- 4. The discussion of the formation of impurities is **acceptable**.
- 5. All certified limits are acceptable.
- 6. The enforcement analytical method is **unacceptable**. The data that was submitted address the manner in which total solid content is analyzed and does not address how the product is analyzed for the concentration of the active ingredient.
  - 7. The color, physical state, and odor are **acceptable** as the product is a pale yellow to off-white liquid which is odorless to slight alcohol.
  - 8. The density is **unacceptable**. The CSF states that the density 8.34 lbs/gal, but the unsigned self-certification gives a value of 8.32 lbs/gal. This test must also be conducted under GLP compliance.
  - 9. The pH is **unacceptable** because the test was not conducted under GLP compliance.
  - 10. The oxidation/reduction potential is **acceptable** as the product contains neither oxidizing nor reducing agents.
  - 11. The flammability is **acceptable** as the product is non-flammable.
  - 12. The explodability is **acceptable** as the product does not contain potentially explosive materials.
- 13. The tests for storage stability and corrosion characteristics are ongoing. They must be conducted under GLP compliance.

- 14. The viscosity is unacceptable because the test was not conducted under GLP compliance.
  - 15. The miscibility is acceptable as the product is dispersible in water.
  - 16. The dielectric breakdown voltage is acceptable as the product will not be used around electrical equipment.

#### **RECOMMENDATIONS:**

1. Product Science Branch of Antimicrobials Division finds this submission in support of the registration of 83075-R to be unacceptable for the reasons stated in the findings. The registrant must remedy the problems stated in the findings before registration can proceed.

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460



OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES Antimicrobials Division

March 15, 2006

SUBJECT: PRODUCT CHEMISTRY REVIEW OF:

Goldshield5

DP Barcode: D326126

TGAI\MUP

[] OR

Reg. No. Or File Symbol: 83075-R

**End-use Product [X]** 

TO:

Velma Noble\Tracy Lantz

PM Team No. 31

FROM:

Chris Jiang, Chemist

Product Science Branch

Antimicrobials Division (7510C)

THRU:

Karen P. Hicks, CTT Team Leader

Product Science Branch

Antimicrobials Division (7510C)

THRU:

Michele Wingfield, Branch Chief

Product Science Branch

Antimicrobials Division (7510C)

Product Formulation for Goldsheild5 from label

Active Ingredient(s)

% by wt.

5.0 %

Octadecylaminodimethyltrihydroxysilyl propyl ammonium chloride

#### **BACKGROUND:**

The registrant has submitted a product chemistry package in support of a new registration of a microbiostatic agent. The package contains a label, a Confidential Statement of Formula, and studies that have been identified by the Agency as MRID #'s 446731901 and 46718501.

#### FINDINGS:

- 1. The concentration of the active ingredient on the Confidential Statement of Formula (CSF dated 12 Dec 2005) is inconsistent with the label declaration. The registrant must revise the CSF and/or label so that they match exactly.
- 2. The stabilizer in the formulation is not cleared for use in pesticidal formulations. The registrant must either substitute the uncleared inert with an already cleared inert or have the supplier send the complete compositional information of the uncleared ingredient to the Agency. The information must include the product name (which must exactly match the name on the CSF), manufacturer name/address and complete chemical composition including the chemical name, CAS Reg. No. and percentage by weight for each component of the mixture. This information must be typed on manufacturer's letterhead and accompanied by a signature.
- 3. The descriptions of the starting materials and the manufacturing\production\formulation process are acceptable, pending clearance of the uncleared inert.
- 4. The discussion of the formation of impurities is **acceptable**.
- 5. The certified limits cannot be determined because of the uncleared inert. The registrant may wish to alter the formulation with other inerts and this would necessitate recalculation of the certified limits.
- 6. The enforcement analytical method is **unacceptable**. The data that was submitted address the manner in which total solid content is analyzed and does not address how the product is analyzed for the concentration of the active ingredient.
- 7. The color, physical state, and odor are **acceptable** as the product is a pale yellow to off-white liquid which is odorless to slight alcohol.
- 8. The density is **unacceptable**. The CSF states that the density 8.34 lbs/gal, but the unsigned self-certification gives a value of 8.32 lbs/gal. This test must also be conducted under GLP compliance.
- 9. The pH is unacceptable because the test was not conducted under GLP compliance.
- 10. The oxidation/reduction potential is **acceptable** as the product contains neither oxidizing nor reducing agents.

- 11. The flammability is acceptable as the product is non-flammable.
- 12. The explodability is acceptable as the product does not contain potentially explosive materials.
- 13. The tests for storage stability and corrosion characteristics are ongoing. They must be conducted under GLP compliance.
- 14. The viscosity is unacceptable because the test was not conducted under GLP compliance.
- 15. The miscibility is acceptable as the product is dispersible in water.
- 16. The dielectric breakdown voltage is **acceptable** as the product will not be used around electrical equipment.

#### **RECOMMENDATIONS:**

1. Product Science Branch of Antimicrobials Division finds this submission in support of the registration of 83075-R to be unacceptable for the reasons stated in the findings. The registrant must remedy the problems stated in the findings before registration can proceed.

#### **CERTIFICATION STATEMENT**

I hereby certify that, for purposes of FIFRA sec. 12(a)(1)(C), the description of the composition of Gold Shield 5, refers to the composition set forth on the Statement of Formula and supporting materials. This description includes the representations that:

- 1) no ingredient will be present in the product in an amount greater than the upper certified limit or in an amount less than the lower certified limit specified for that ingredient in a currently approved Statement of Formula; and
- 2) if the Agency requires that the source of supply of an ingredient be specified, that all quantities of such ingredient will be obtained from the source specified in the Statement of Formula.

Company: NBS Technology, LLC

Company Agent: Tom Higgins, President

Signature:

Date: December 20, 2005



**Jeff Jones** <jjones@delta-ac.com> 02/01/2006 03:11 PM

To Tracy Lantz/DC/USEPA/US@EPA

"Tom Higgins" <thigginsnbst@optonline.net>, Stuart Kaufman <sknbst@optonline.net>

bcc

Subject RE: Submission for Gold Shield 5 83075-R

#### Tracy:

Attached please find a revised data matrix changing our method of data support to "cite-all" for dermal sensitization as you requested. Let me know if you need anything else.

Can you tell me what the decision due date is for this application? Thanks.

Best regards,

Jeff Jones jjones@delta-ac.com



revised data matrix signed 1 Feb 2006.pdf

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street S.W. Washington, D.C. 20480

#### **END-USE DATA MATRIX** Date: 1 Feb 2008 EPA Reg. No./File: TBA Page 1 of 2 Applicant's/Registrani Name & Address: NBS Technology, LLC c/o Delta Analytical Corporation, Product: Gold Shield 5 7910 Woodmont Ave., Suite 1000, Bethesda, MD 20814 ingredient(s): 3-(trimethyoxysilyt) propyl dimethyl octadacyl ammonium chloride **Guideline Reference Number Guideline Study Name MRID Number** Submitter Status Note 830.1550 Product identity and composition 48718501 NBS Technology, LLC submitted 20 Dec 2005 OWN 830.1600 Description of the materials used to produce 46718501 NBS Technology, LLC submitted 20 Dec 2005 the product submitted 20 Dec 2006 830,1850 Description of the manufacturing process 46718501 NBS Technology, LLC OWN 630.1670 Discussion of the formation of impurities submitted 20 Dec 2005 46718501 NBS Technology, LLC OWN 830,1760 **Cartifled Limits** 46718501 submitted 20 Dec 2005 NBS Technology, LLC OWN 830,1800 Enforcement analytical method 46718501 NBS Technology, LLC submitted 20 Dec 2005 OWN 46731901 830.6303 Physical state NBS Technology, LLC OWN submitted 20 Dec 2005 Oxidation/reduction: chemical compatibility \$30.6314 46731901 NBS Tachnology, LLC OWN submitted 20 Dec 2005 830.6315 Flammability 46731901 NBS Technology, LLC submitted 20 Dec 2005 own 830.8315 **Explodability** 48731901 NBS Technology, LLC submitted 20 Dec 2005 own 830,6317 Storage stability to be submitted submitted 20 Dec 2005 830.6319 Miscibility 46731901 NBS Technology, LLC own 830,8320 Corrosion characteristics to be submitted submitted 20 Dec 2005 830,6321 Dielectric breakdown voltage 46731901 NBS Technology, LLC OWITS 530,7000 pH 48731901 NBS Technology, LLC OWN submitted 20 Dec 2005 830.7100 Viscosity submitted 20 Dec 2005 48731901 NBS Technology, LLC OWN 830,7300 Density/relative density/bulk density 46731901 NBS Technology, LLC own submitted 20 Dec 2005

Signature: Them. Its

Name & Title: Tom Higgins, President, NBS Technology, LLC

Dete: 1 Feb 2006

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street S.W. Washington, D.C. 20480

#### **END-USE DATA MATRIX** Page 2 of 2 Date: 1 Feb 2006 EPA Reg. No./File: TBA Applicant's/Registrant Name & Address: NBS Technology, LLC c/o Delta Analytical Corporation, 7910 Woodmont Ave., Suite 1000, Bathesda, MD 20814 Product: Gold Shield 5 ingradient(s):3-(trimethyoxystlyf) propyl dimethyl octadecyl ammonium chloride **Guideline Study Name** Note Guldeline Reference Number **MRID Number** Submitter Status 870.1100 Acute oral toxicity - rat cits-all PAY see Attachment 1 for list of companies to which offer to pay letters have been sent 870.1200 Acute dermal toxicity - rabbit PAY cite-all Acute inhalation toxicity - rat cits-all PAY 870,1300 75497-1 870.2400 Primary eye irritation - rabbit 44553501 Bioshield Technologies, Inc. PAY 75497-2 44789801 870.2500 Primary dermal irritation cite-ali PAY 870.2600 Dermal sensitization cits-all PAY Name & Title:Tom Higgins, President, NBS Technology, Date: 1 Feb 2008



Tracy Lantz/DC/USEPA/US 01/27/2006 07:11 PM To jjones@delta-ac.com

C

bcc

Subject Submission for Gold Shield 5 83075-R

Dear Mr. T. Jeffrey Jones,

We have done a preliminary review of your application dated 12/20/05. You have submitted a waiver for dermal sensitization. Unfortunately, your waiver is unacceptable. Please FAX a revised data matrix using the cite all option to support the data requirement for dermal sensitization. Please be sure the matrix is signed and sent the FAX to my attention at 703 308 8481.

Thanks, Tracy Lantz

## **NEW APPLICATIONS**

DATE: 12/83/05
FILE NUMBER: 83075-R.
FEP (OPPIN ENTRY): 19/23/05 Rem (Initial & date)
FILE ROOM: LA 1/1/04 (Initial & date)
SIG: MO 1/4/06 (Initial & date)
FILE ROOM: 1/5/1/4 (Initial & date)
ASSIGN TO PM 3/

# FEE FOR SERVICE



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

December 28, 2005

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

#### PLEASE RETURN A COPY OF THIS LETTER WITH PAYMENT

OPP Decision Number: D-363320

EPA File Symbol or Registration Number: 83075-R

Product Name: GOLD SHIELD 5 EPA Receipt Date: 23-Dec-2005 EPA Company Number: 83075

Company Name: NBS TECHNOLOGY, LLC

JEFF JONES
DELTA ANALYTICAL CORP
NBS TECHNOLOGY, LLC
7910 WOODMONT AVE., SUITE 1000
BETHESDA, MD 20814-

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

#### Dear Registrant:

The Office of Pesticide Programs has received your application for registration. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: A53

ME-TOO; NEW PRODUCT; FAST TRACK;

Please remit payment in the amount of: \$ 1.050 to:

By USPS:

USEPA Washington Finance Center Pesticide Registration Service Fee PO Box 360277 Pittsburgh, PA 15251 By Courier:

U.S. EPA Washington Finance Center Pesticide Registration Service Fee C/O Mellon Client Service Center 500 Ross Street, Room 670 Box 360277 Pittsburgh, PA 15251-6277

Attn: EPA Module Supervisor Telephone: (412) 236-2294

All payments must be in United States currency by check, bank draft, or money order drawn to the order of the Environmental Protection Agency. To ensure proper credit, please write the OPP DECISION NUMBER on your check, and enclose a copy of this letter with your payment.

You may be eligible for a full or partial waiver of the registration service fee if, for example, you qualify as a small business or are applying for a minor use, or if your application is solely associated with an IR-4 tolerance petition. Please be advised that if you intend to request a waiver, you must do so in writing within 15 days of receipt of this invoice instead of remitting the amount indicated above. OPP will not consider waiver requests after the registration service fee has been paid. Information regarding eligibility and how th request and document a fee waiver is available on the OPP Fee for Service web site at www.epa.gov/pesticides/fees.

Please send Registration Service Fee Waiver requests to:

By USPS:

Document Processing Desk (WAIVER) Office of Pesticide Programs (7504C) U.S. Environmental Protection Agency 1200 Pennsylvania Ave NW Washington, DC 20460 By Courier:

Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room 266A, Crystal Mall #2
1801 S. Bell St.
Arlington, VA 22202

A PRIA decision time review period will not start until a fee waiver is granted and/or the Agency receives certification that the outstanding fee has been paid. If the Agency does not receive certification of payment for this action or a fee waiver request within the next 45 days, the Agency will presume that you no longer want to pursue this action. The Agency will then initiate a process that may result in administrative withdrawal of this action.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 308-6432.

Sincerely,
Tarisa Downs

Front End Processing Staff

Information Technology & Resources Management Division

## Fee for Service



31

This package includes the following

- New Registration
- Amendment

Studies?

□ Fee Waiver?

□ˈvolpay % Reduction:

for Division · AD **BPPD** ° RD

Receipt No.

S-788195

EPA File Symbol/Reg. No.

83075-R

Risk Mgr.

Pin-Punch Date:

12/23/05

This item is NOT subject to FFS action.

### **Action Code:**

Requested:

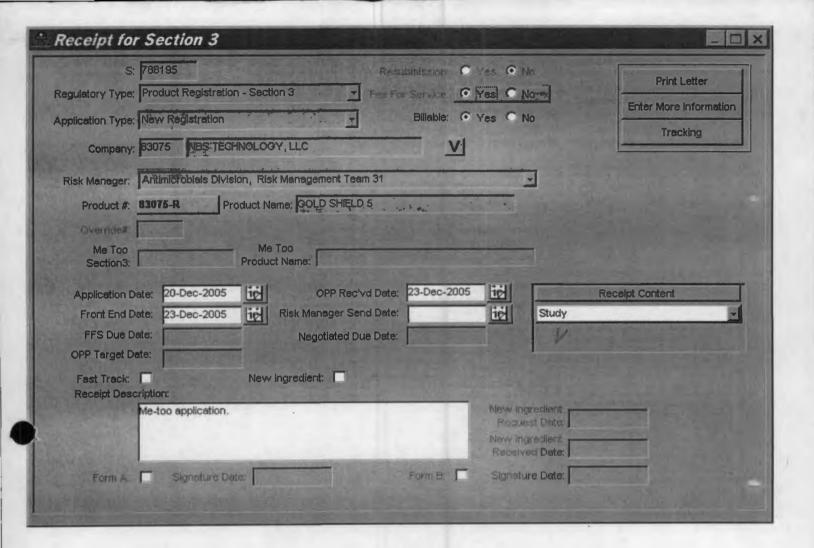
Granted:

Amount Due:

\$ 1,000

Parent/Child Decisions:

Remarks:





## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

January 17, 2006

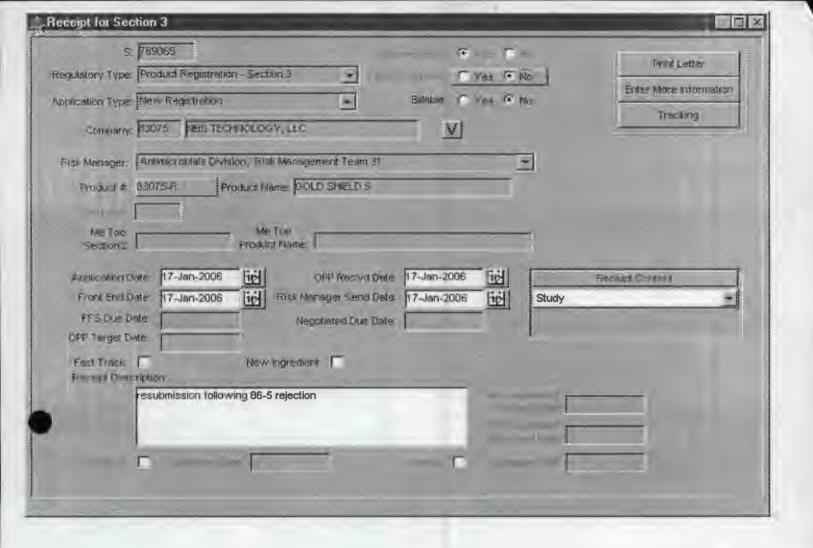
OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

NBS TECHNOLOGY, LLC 7910 WOODMONT AVE., SUITE 1000 BETHESDA, MD 20814-

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 17-JAN-06. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.





December 20; 2005

Document Processing Desk (APPL)
Office of Pesticide Programs
Environmental Protection Agency
Washington, DC 20460

re: Registration of Substantially Similar Product

Product: Gold Shield 5

Company: NBS Technologies, LLC

EPA#: TBA

Dear Sir or Madam:

Enclosed please find the following documents submitted in support of a "me-too" application for Gold Shield 5 manufactured by NBS Technologies, LLC:

- Agent Letter
- Application for Pesticide Registration (EPA Form 8570-1);
- Confidential Statement of Formula (EPA Form 8570-4) and Certification Statement (2 copies);
- Formulator's Exemption Statement (EPA Form 8570-27);
- Certification with Respect to Citation of Data and Data Matrix (EPA Form 8570-34);
- Proposed label (5 copies); and
- Cover letter and supporting data.

NBS Technologies is a new applicant for pesticide registration so I request that the Agency assign it a company number at this time.

The proposed label for Gold Shield 5 is patterned after the label previously approved for Bioshield AM 500 (EPA Reg. No. 75497-1) and it is similar in formulation to this product.

If you have any questions regarding this submission, please contact me at your convenience at <u>jiones@delta-ac.com</u>. Thanks for your consideration.

Sincerely,

T. Jeffrey Jones, Agent NBS Technologies, LLC



December 20, 2005

Document Processing Desk (APPL) Office of Pesticide Programs US Environmental Protection Agency Washington, DC 20460

"Me Too" Application for Registration; Supporting Data re:

> Gold Shield 5 Product:

Company: NBS Technology, LLC

**EPA** #: TBA

Dear Sir or Madam:

Enclosed please find the following data submitted in support of registration of Gold Shield 5:

Volume 1 of 2

Product Chemistry: Manufacturing Process Description, Certification of Limits and

Enforcement Analytical Method for Gold Shield 5

Product Chemistry Series 61 & 62

MRID# 46718501

Volume 2 of 2

Physical and Chemical Characteristics of Gold Shield 5

Product Chemistry Series 63

MRID#

46731901

If you have any questions regarding this submission, please contact me as soon as possible at jjones@delta-ac.com

Sincerely,

T. Jeffrey Jones, Agent

NBS Technology, LLC



#### Facsimile Message

Total No. of Pages Including Cover: 2

January 13, 2006

To: Tracy Lantz

From: Jeff Jones

Subject: NBS Technology LLC; Your Letter Dated December 29, 2005; Rejected Study

Attached please find a substitute page 2 of 4 for Vol. 2 of 2, "Physical and Chemical Characteristics of Gold Shield 5." This study was prepared while I was traveling and our review process was not as thorough as it should have been. There is no confidential information in the study and the previous claim was submitted in error.

I appreciate your handling this correction by fax. If you have additional questions, please contact me.

Best regards,

### **MEMORANDUM**

DATE:	12/30/05	
TO:	AD(31)	, Regulatory Manager

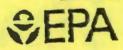
FROM: Information Services Branch, IRSD

Your receipt of this data submission is not an indication that MRIDs for the enclosed studies have been posted in OPPIN.

We expect that it will be approximately 5 days from the above date before the study-level data is available in OPPIN.

If you have any questions about this process, please contact Maureen Sherrill (305-5361) or Teresa Downs (305-5363).

This is a:	□ fully accepted submission
	partially accepted submission
	□ rejected submission



ADMINISTRATIVE NO(S).:	83075 - R
PM: 31	•
CHEMICAL NO.:	

The jacket for this action can be requested through the JACKETS system.

TRANSMISSION OK

TX/RX NO
CONNECTION TEL
SUBADDRESS
CONNECTION ID
ST. TIME
USAGE T
PGS.

RESULT

3653

913016525408

Delta 01/13 12:22 01'33 4 OK



# United States Environmental Protection Agency Washington, D.C. 20460

Office of Prevention, Pesticides and Toxic Substances
Office of Pesticide Programs
Antimicrobial Division

FAX NUMBER (703)- 303 8481

# FACSIMILE REQUEST/COVER SHEET (Please type or print clearly in black ink only)

SEND FAX TO:	T. Veffery Jones	
Office:	Delta	
FAX Phone No	301 652 5408	
Office Phone No	301 652 5495	
FROM:	Tray Lantz	· ·
Division/Branch:	AD	266



## United States Environmental Protection Agency Washington, D.C. 20460

# Office of Prevention, Pesticides and Toxic Substances Office of Pesticide Programs Antimicrobial Division

FAX NUMBER (703)- 308 8481

# FACSIMILE REQUEST/COVER SHEET (Please type or print clearly in black ink only)

SEND FAX TO:	T. Jaffery Jones
Office:	Delta.
FAX Phone No.	301 652 5408
Office Phone No.	301 652 5495
FROM: Name:	Tray Lantz
Division/Branch:	AD
Office Phone No.	703 308 6415
Office Room No.	
Mail Code: 75/0C	Date: 1/13/06. Time: 11:24 AM
Number of pages (with this	cover sheet): 4
Special Message:	Please send corretions by
	(4)
	2.



### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

December 29, 2005

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

NBS TECHNOLOGY, LLC 7910 WOODMONT AVE., SUITE 1000 BETHESDA, MD 20814-

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 23-DEC-05. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your data submittal was found to be partially in compliance with the standards for submission of data contained in PR Notice 86-5, with the exceptions noted below. A copy of your transmittal bibliography is enclosed, annotated with the Master Record ID's (MRIDs) assigned to each document accepted. Please use these numbers in all future references to these documents.

If deficiencies were found which apply to individual accepted studies, they are listed below following the applicable MRID. Any document which has been assigned a MRID has been accepted under PR Notice 86-5. If any comments related to a MRID appear on this report, they are provided for your information and reference when preparing future submissions. Some individual documents were not acceptable, and all copies are being returned to you for correction for the reasons indicated below.

These rejected studies have been assigned separate identification numbers which are annotated on both the enclosed bibliography and the rejected document labels.

The rejected studies and their deficiencies are described below.

Rejected Study [02]:

- * You failed to provide the Confidential Data in the Confidential attachment.
- * FIFRA Section 10(d)(1) only provides for confidentiality of information which: (A) discloses manufacturing or quality control processes, (B) discloses the details of any methods for testing, detecting, or measuring the quantity of any deliberately added inert ingredient of a pesticide, or (C) discloses the identity or percentage quantity of any deliberately added inert ingredient of a pesticide... Since your claim covers information entirely outside this narrow range of subject matter, it cannot be accepted.



Document Processing Desk (APPL) Office of Pesticide Programs Environmental Protection Agency Washington, DC 20460

re:

Registration of Substantially Similar Product

**Product:** 

Gold Shield 5

Company:

NBS Technologies, LLC

**EPA#:** 

TBA

Dear Sir or Madam:

Enclosed please find the following documents submitted in support of a "me-too" application for Gold Shield 5 manufactured by NBS Technologies, LLC:

- Agent Letter
- Application for Pesticide Registration (EPA Form 8570-1);
- Confidential Statement of Formula (EPA Form 8570-4) and Certification Statement (2 copies);
- Formulator's Exemption Statement (EPA Form 8570-27);
- Certification with Respect to Citation of Data and Data Matrix (EPA Form 8570-34);
- Proposed label (5 copies); and
- Cover letter and supporting data.

NBS Technologies is a new applicant for pesticide registration so I request that the Agency assign it a company number at this time.

The proposed label for Gold Shield 5 is patterned after the label previously approved for Bioshield AM 500 (EPA Reg. No. 75497-1) and it is similar in formulation to this product.

If you have any questions regarding this submission, please contact me at your convenience at jjones@delta-ac.com. Thanks for your consideration.

Sincerely,

T. Jeffrey Jones, Agent NBS Technologies, LLC

(301) 652-5495 FAX (301) 652-5408

7910 Woodmont Avenue Suite 1000 Bethesda, Maryland 20814



Document Processing Desk (APPL) Office of Pesticide Programs US Environmental Protection Agency Washington, DC 20460

"Me Too" Application for Registration; Supporting Data re:

> Gold Shield 5 **Product:**

Company: NBS Technology, LLC

**EPA** #: **TBA** 

Dear Sir or Madam:

Enclosed please find the following data submitted in support of registration of Gold Shield 5:

Volume 1 of 2

Product Chemistry: Manufacturing Process Description, Certification of Limits and Enforcement Analytical Method for Gold Shield 5

Product Chemistry Series 61 & 62

MRID# 46718501

Volume 2 of 2

Physical and Chemical Characteristics of Gold Shield 5

**Product Chemistry Series 63** 

MRID#

Reject (02)

If you have any questions regarding this submission, please contact me as soon as possible at jjones@delta-ac.com

Sincerely,

T. Jeffrey Jones, Agent

NBS Technology, LLC

effrey Jones / TDD

Administrative

Materials



### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

December 29, 2005

NBS TECHNOLOGY, LLC 7910 WOODMONT AVE., SUITE 1000 BETHESDA, MD 20814OFFICE OF PREVENTION PESTICIDES AND TOXIC SUBSTANCES

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Document Processing Desk (APPL)
Office of Pesticide Programs
Environmental Protection Agency
Washington, DC 20460

re: Registration of Substantially Similar Product

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Company: NBS Technologies, LLC

EPA#: TBA

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T. Jeffrey Jones, Agent NBS Technologies, LLC

7910 Woodmont Avenue

Avenue Suite 1000 Bethesda, Maryland 20814 (301) 652-5495 FAX (301) 652-5408



Document Processing Desk (APPL)
Office of Pesticide Programs
US Environmental Protection Agency
Washington, DC 20460

re:

"Me Too" Application for Registration; Supporting Data

Product:

Gold Shield 5

Company:

NBS Technology, LLC

**EPA** #:

**TBA** 

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MRID# 46718501

• Volume 2 of 2

Physical and Chemical Characteristics of Gold Shield 5

**Product Chemistry Series 63** 

MRID#

Reject (02)

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Sincerely,

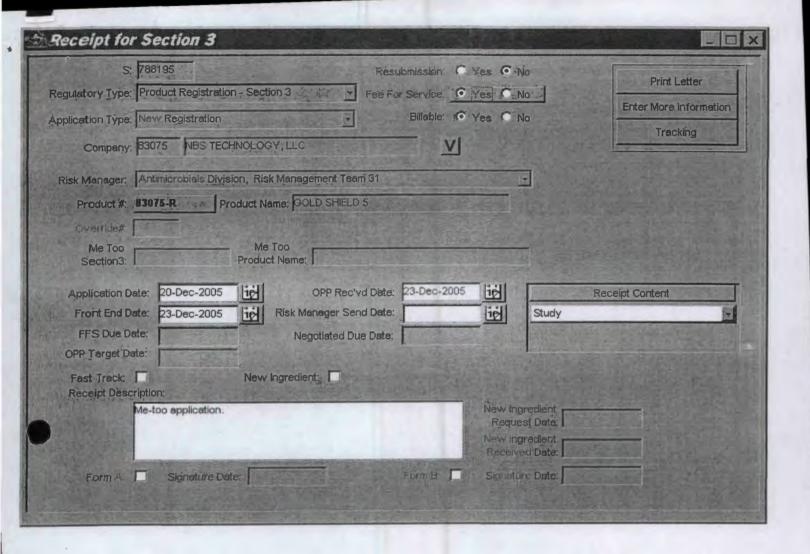
T. Jeffrey Jones, Agent NBS Technology, LLC

7910 Woodmont Avenue

Suite 1000

Bethesda, Maryland 20814

(301) 652-5495 FAX (301) 652-5408



### MEMORANDUM

DATE: 1/19/06

TO: AD(31) Regulatory Manager

FROM: Information Services Branch, IRSD

Your receipt of this data submission is not an indication that MRIDs for the enclosed studies have been posted in OPPIN.

We expect that it will be approximately 5 days from the above date before the study-level data is available in OPPIN.

If you have any questions about this process, please contact Maureen Sherrill (305-5361) or Teresa Downs (305-5363).

This is a:

Fully accepted submission

□ partially accepted submission

□ rejected submission



Document Processing Desk (APPL)
Office of Pesticide Programs
Environmental Protection Agency
Washington, DC 20460

re: Registration of Substantially Similar Product

Product: Gold Shield 5

Company: NBS Technologies, LLC

EPA#: TBA

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Jones /

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T. Jeffrey Jones, Agent NBS Technologies, LLC



Document Processing Desk (APPL)
Office of Pesticide Programs
US Environmental Protection Agency
Washington, DC 20460

re: "Me Too" Application for Registration; Supporting Data

Product: Gold Shield 5

Company: NBS Technology, LLC

EPA#: TBA

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 Product Chemistry Series 61 & 62

MRID# 46718501

Volume 2 of 2
 Physical and Chemical Characteristics of Gold Shield 5
 Product Chemistry Series 63
 MRID#
 46731901

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Sincerely,

T. Jeffrey Jones, Agent

NBS Technology, LLC

Jones/DD



#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460.

Do not send the completed form to this address.

comments regarding duries essentite or any other aspect of this corection of whome information Management Division (2137), U.S. Environmental Protection Agency, 40 Do not send the completed form to this address.						
Certification with Respec	t to Citation	of Data				
Applicant's/Registrant's Name, Address, and Telephone Number NBS Technology, LLC c/o Delta Analytical Corp., Silver Spring, MD 20904; 301 8	EPA Registration Number/File Symbol 83075-PC					
Active ingredient(s) and/or representative test compound(s) 3-(trihydroxysilyi) propyl dimethyl octadecyl ammonium chloride	Dete 16 June 2006					
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158)  Product Name Goldshield 5						
NOTE: If your product is a 100% repackaging of another purchased EPA-register submit this form. You must submit the Formulator's Exemption Statement (EPA For		ed for all the same uses on your label, you do not need to				
I am responding to a Deta-Cell-In Notice, and have included with this form a be used for this purpose).	a list of companie	s sent offers of compensation (the Data Matrix form should				
SECTION I: METHOD OF DATA SUP	PORT (Check o	ne method only)				
I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	unde	using the selective method of support (or cite-all option or the selective method), and have included with this form a pleted list of data requirements (the Data Matrix form must be I).				
SECTION II: GENERAL	OFFER TO PA	Y				
I hereby offer and agree to pay compensation, to other persons, with regard to SECTION IN: CER		fithis application, to the extent required by FIFRA.				
I certify that this application for registration, this form for reregistration, or application for registration, the form for reregistration, the Data-Cell-in response. Indicated in Section I, this application is supported by all data in the Agency's files the substantialty similar product, or one or more of the ingredients in this product; and (2 requirements in effect on the date of approval of this application if the application socuses.	in addition, if the set (1) concern th b) is a type of data ught the initial rep	cite-all option or cite-all option under the selective method is se properties or effects of this product or an identical or a that would be required to be submitted under the data gistration of a product of identical or similar composition and				
I certify that for each exclusive use study cited in support of this registratio the written permission of the original data submitter to cite that study.	n or reregistratio	n, that I am the original data submitter or that I have obtained				
I certify that for each study cited in support of this registration or reregistra submitter; (b) I have obtained the permission of the original data submitter to use the compensation have expired for the study; (d) the study is in the public therature; or (c offered (f) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3 amount and terms of compensation, if any, to be paid for the use of the study.	e study in suppor e) I have notified	t of this application; (c) all periods of eligibility for in writing the company that submitted the study and have				
I certify that in all instances where an offer of compensation is required, or accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will evidence to the Agency upon request, I understand that the Agency may initiate activities.	be submitted to	the Agency upon request. Should I fall to produce such				
I certify that the statements I have made on this form and all attache knowingly false or misleading statement may be punishable by fine or impris	nents to it are	rue, accurate, and complete. I acknowledge that any sunder applicable law.				
Signature Town 171994	Dete	Typed or Printed Name and Title				

EPA Form 8570-34 (9-97) Electronic and Paper versions available. Submit only Paper version.

SEPA

**Environmental Protection Agency** 

Formulator's Exemption Statement

Applicant's Name and Address

NBS Technology, LLC c/o Delta Analytical Corporation 12510 Prosperity Drive, Suite 160 Silver Spring, MD 20904

SPA File Symbol/Registration Number

83075-R

Product Name

Gold Shield 5

Date of Confidential Statement of Formula (EPA Form 8570-4)

10 April 2006

As an authorized representative of the applicant for registration of the product identified above, I certify that:

- (1) This product contains the following active ingredient(s):
  - 3-(trihydroxysily!) propyl dimethyl octadecyl ammonium chloride
- Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another producer, and is labeled for at least each use for which my product is proposed to be lubeled."
- (3) Indicate by checking (A) or (B) below which paragraph applies:
- (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formule statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).
- (B) The Confidential Statement of Formule (CSF) (EPA Form 8570-4) referenced above and on file with the EPA is complete, current, and accurate and contains the information required on the current CSF.
- (4) The following active ingredients in this product gualify for the formulator's exemption.

#### Source

Aceive ingredient	Product Name	Registration Number
Signature Tou Haauri 12	Name and Title Date Tom Hingins President NBS - 14 li	une 2006

Ferm 8570-27 (Rev. 8-85)

1 11 1

White - EPA: eapy Yellow - Applicant copy

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street S.W. Washington, D.C. 20460

#### END-USE DATA MATRIX

Date: 20 Dec 2005		EPA Reg. No /File: TBA		Page 1 of 2		
Applicant's/Registrant Name & Address: NBS Technology, LLC c/o Delta Analytical Corporation, 7910 Woodmont Ave., Sulte 1000, Bethesda, MD 20814			Product: Gold Shield 5			
Ingredient(s): 3-(trimethyoxysli	lyl) propyl dimethyl octadecyl ammonium chlorida					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note	
830.1550	Product identity and composition	TBA	NBS Technology, LLC	own	submitted 20 Dec 2005	
830.1600	Description of the materials used to produce the product	TBA	NBS Technology, LLC	own	submitted 20 Dec 2005	
830.1650	Description of the manufacturing process	ТВА	NBS Technology, LLC	own	submitted 20 Dec 2005	
830.1870	Discussion of the formation of impurities	TBA	NBS Technology, LLC	own	submitted 20 Dec 2005	
830.1750	Certified Limits	TBA	NBS Technology, LLC	own	submitted 20 Dec 2005	
830.1800	Enforcement analytical method	TBA	NBS Technology, LLC	own	submitted 20 Dec 2005	
830.6303	Physical state	ТВА	NBS Technology, LLC	own	submitted 20 Dec 2005	
830.6314	Oxidation/reduction: chemical compatibility	TBA	NBS Technology, LLC	own	submitted 20 Dec 2005	
830.6315	Flammability	TBA	NBS Technology, LLC	own	submitted 20 Dec 2005	
830.6316	Explodability	TBA	NBS Technology, LLC	own	submitted 20 Dec 2005	
830.6317	Storage stability				to be submitted	
830.6319	Miscibility	ТВА	NBS Technology, LLC	own	submitted 20 Dec 2005	
830.6320	Corrosion characteristics				to be submitted	
830.6321	Dielectric breakdown voltage	TBA	NBS Technology, LLC	own	submitted 20 Dec 2005	
830.7000	pH	ТВА	NBS Technology, LLC	own	submitted 20 Dec 2005	
830.7100	Viscosity	ТВА	NBS Technology, LLC	own	submitted 20 Dec 2005	
830.7300	Density/relative density/bulk density	TBA	NBS Technology, LLC	own	submitted 20 Dec 2005	
	0					
	12					

Signature: / Chimic of Signature

Name & Title: Tom Higgins, President,, NBS Technology, LLC

Date: 20 Dec 2005

### UNITED STEES ENVIRONMENTAL PROTECTION AGEN 401 M Street S.W. Washington, D.C. 20460

Date: 20 Dec 2005	EPA Reg. No./File: TBA		Page 2 of 2			
Applicant's/Registrant Name & Address: NBS Technology, LLC c/o Delta Analytical Corporation, 7910 Woodmont Ave., Suite 1000, Bethesda, MD 20814			Product: Gold Shield 5			
Ingredient(s):3-(trimethyoxysily	l) propyl dimethyl octadecyl ammonium cl	hloride				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note	
B70.1100	Acute oral toxicity - rat	cite-all		PAY	see Attachment 1 for list of companies to which offer to partetters have been sent	
870.1200	Acute dermal toxicity - rabbit	cite-all		PAY		
870.1300	Acute inhalation toxicity - rat	cite-all		PAY		
870.2400	Primary eye irritation - rabbit	44553501 44789801	Bioshleld Technologies, Inc. 75497-1,-2,-4	PAY		
870.2500	Primary dermal irritation	cite-all		PAY		
870.2600	Dermal sensitization			WAIVE	see Attachment 2 for waiver rationale	
Signature:	5 -11	le: Tom Higgins, President	NBS Date: 20 D	ec 2005		

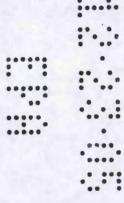
### Attachment I List of Companies to Which Offer to Pay Letters Have Been Sent 20 December 2005

Company No.	Name of Company
008591	Nalco Diversified Technologies, Inc.
048737	Goulston Technologies, Inc.
063394	American Chemistry Council Biocides Panel
064881	Aegis Environmental Management Inc.
066607	Spray Drift Task Force
070891	Bioshield Technologies, Inc.
075174	Sishield Technologies, Inc.
079652	Laird's Regulatory Consultants Inc.
081260	Ennico2 Inc.



Attachment 2
Rationale for Waiver of Dermal Sensitization Data Requirement
20 Dec. 2005

Neither the active ingredient or any of the other ingredients in the proposed formulation are dermal sensitizers. Consequently, the dermal sensitization data requirement should be waived.







Document Processing Desk (APPL) Office of Pesticide Programs Environmental Protection Agency Washington, DC 20460

re:

Registration of Substantially Similar Product

**Product:** 

Gold Shield 5

Company:

NBS Technologies, LLC

**EPA #:** 

**TBA** 

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Suite 1000

Bethesda, Maryland 20814



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Office of Pesticide Programs
US Environmental Protection Agency
Washington, DC 20460

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Company: NBS Technology, LLC

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   MRID#
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   MRID#

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Sincerely,

T. Lebbrey Jones / DD

T. Jeffrey Jones, Agent NBS Technology, LLC

### NBS Technology LLC

157 Skunks Misery Rd.
P.O.Box 428
Locust Valley, New York 11560
Contact:enbst@optonline.net

516.674.4085P

516.759.5309F

December 14, 2005

Registration Division Office of Pesticide Programs Environmental Protection Agency Washington, DC 20460

Dear Sir or Madam:

I appoint:

Delta Analytical Corporation 7910 Woodmont Ave., Suite 1000 Bethesda, MD 20814

Telephone:

301 652-5495

Fax:

301 652-5408

as NBS Technology, LLC's agent for pesticide registration matters. Jeff Jones and Donna Leventhal of Delta will be your primary contacts.

Sincerely

Tom Higgins, President

Please resulinstructions on	reverse before compl	leting form.			Form Ar	prove	d. OMB No. 20	70-006	O. Approval expires 2-28-
<b>\$EPA</b>	PEPA Environmental Protection Washington, DC 20460		_	ency		~	Registrati Amendme Other		OPP Identifier Number 306998
		Application	on for	Pestici	de - Sec	tion			
1. Company/Product Number 1. S 3 1 1			1		Product Ma	nager			roposed Classification  None Restricted
4. Company/Product (Name) Gold Shield 5				PM# 3/					
5. Name and Address of Ap NBS Technology, LLC c/o Delta Analytical Cor 7910 Woodmont Ave., 3 Bethesda MD 20814 Check if this	p.	Code)		(b)(i), m to: EPA F	y product	is sim 75497	nilar or identica		FIFRA Section 3(c)(3) emposition and labeling
			Se	ction - I	1				
Amendment - Explain Resubmission in responsition - Explain	ponse to Agency lette	er dated		- v	Final printo Agency le "Me Too" Other - Ex	tter da Applic	ation.	•	
			Sec	tion - I	I				
Material This Product Wi Child-Resistant Packaging	Unit Packaging		Wate	r Soluble P	ackaging		2. Type of Co	nteine	
Yes No	Yes		~	Yes		V	Metal Plastic Glass		
* Certification must be submitted	If "Yes" Unit Packaging wg	No. per t. container	If "Ye Packs	es" age wgt	No. per contain			Paper Other (	Specify)
3. Location of Net Contents  Label	Information Container	4. Size(s) Res 2,4,8,		ail Container 6,20,22,36 oz./1,5		5. Location of Lab			
6. Manner in Which Label is	Affixed to Product	Lithog Paper Stence	glued		Oth	or			
				tion - I	-				***
Name Jeff Jones		for identification	Title Agent		Telephone No. (Include Al		e No. (Include Area Code)		
f certify that the state I acknowledge that ar both under applicable	ny knowlinglly falsa o		all attac						6. Date Application Received (Stamped)
			3. Titte Agent	,					• • • •

5. Date

20 Dec 2005

4. Typed Name

Jeff Jones

Please read instructions on a	reverse before comple	ting form.		Form Approve	d. OMB No. 2070-00	80	
United States  Environmental Protection  Washington, DC 20460			160		Registration Amendment Other	OPP Identifier Number	
		Application	n for Pestici	de - Sectio	n I		
1. Company/Product Number	r		2. EPA	Product Manage	3.	Proposed Classification	
4. Company/Product (Name)			PM#			None Restricted	
5. Name and Address of Ap	plicant (Include ZIP Co	ode)	(b)(i), r to: EPA I			ith FIFRA Section 3(c)(3) composition and labeling	
Sec. 11.			Section -	11			
Amendment - Explain Resubmission in resp Notification - Explain	onse to Agency lette	r dated		Final printed la Agancy letter of "Me Too" App Other - Explain	lication.		
1. Material This Product Will Child-Resistant Packaging	Unit Packaging		Section -		2. Type of Contain		
Yes* No  Certification must	No No If "Yes"	No. per	Yes No	No. per		Aetal Pastic Slass Paper	
be submitted	Unit Packaging wgt	. container	Package wgt	container	Othe	r (Specify)	
3. Location of Net Contents	Information Container	4. Size(s) Reta	ail Container	5.	Location of Label Director On Label On Labeling and	ctions	
6. Manner in Which Label is	Affixed to Product	Lithogr Paper e Stencil	lued				
			Section - I	V		0 0 0	
1. Contact Point (Complete	items directly below	for identification	n of individual to L	be contacted, if I	necessary, to present		
Name			Title			none Np. fipçiûde Area Code)	
I certify that the state I acknowledge that as both under applicable	ny knowingly false or		all attachments th		occurate and complete.	6. Date Application Received(Stamped)	
2. Signature			3. Title				
4. Typed Name			5. Date			289	

Yellow - Applicant Copy